

A translation approach to
CE declaration of conformity documents
Common translation differences found in EN-ES documents

María del Carmen López Ruiz
University of Córdoba

Received: 15/10/2018
Accepted: 27/12/2018

Abstract

There are several European documents concerning small and medium enterprises (SMEs) which do not count with an official translation template into several languages at a time. This is the case of one of the most employed documents amongst international enterprises: the *CE declaration of conformity* documents. The enterprise's intention towards the usage of this document is to arrange all the qualifications and characteristics of an item described following the intended instructions as detailed in EU legislation. It is true that many enterprises do have these kind of documents translated into several languages, but they do not follow any official template made by any EU organization, and that makes even more difficult for translators (and for enterprises) to look for a "model" to base their terminological proposals. In general, the macrostructure of this type of document, once translated into different languages, is very similar, but not totally equal. As these documents adopt a similar format style, we can often find the translation in several languages in the same document, separated by slashes and not in a new drafted document aside. Although it is very common to find the translation made like that, the quality of translation is not assured: in the major part of the cases, the slashes only separate the original word from its corresponding literal translation into the TM. We analyze the different mistakes found in the translation of CE declaration of conformity documents in the English/Spanish language combination and describe what these documents are for following the instructions as defined in EU legislations. We offer, as well, our own proposal of EN/ES translation basing our results in both printed and computer-based real corpus.

Key Words

Business translation, legal translation, CE declaration of conformity,
EU, European legislation.

Introduction

The importance that Intellectual Property and CE marking directives play with regards to CE declaration of conformity documents is huge nowadays, given the context that international enterprises are facing: a world of globalisation in which all people around the world receive the same items, the same tools, all in the same conditions and almost at the same time. That has been possible thanks to this social and political movement which lets people be connected around the world: we are referring to the expansion of many enterprises and businesses into markets throughout multinational cooperation and investments.

Given this movement, international enterprises need to arrange a lot of different documents before sending their products or inventions into another country: the goal is to assure that all the qualifications described in the country of the manufacturer will be the same than the products sold to the off-shore country. To assure that this process was pursued, two different projects were created for businesses cooperations: the Intellectual Property and CE marking directives.

As translators, we assume that these documents involve a lot of responsibility: the terminology employed must be exactly the same so that to assure that all the specifications named in the SL are conveniently expressed in the TL. Therefore, we decided to look for the “official” template of the EU organisations, in order to look for this template, but we found that any document like that had been drafted. We expected the EPO or EUR-LEX organisations to have the official document translated into different languages, since this is one of the most employed documents when referring to international businesses and investments in general. But it was not the case, and it would then explain why we could find a lot of CE declaration of conformity documents that respect the “official” template in the original language, English, in terms of macrostructure, but not in terms of terminology: each enterprise employs different words and different phrases to refer to the same idea. We assume then that any process of standardisation has been created or even promoted towards this document. And that was the reason why we decided to research further on this field.

Such documents (the ones drafted by enterprises every single day around the world when promoting international businesses) follow the specifications highlighted by EU regulations, in terms of macrostructure and items needed to be included into the document, but they do not follow any regulations towards

the translation of such documents. In this point, it is important to mention that we have also found lots of documents written in just one language (only in the case of English), but the tendency is to draft a document into a minimum of two languages (as specifications of WIPO [amongst other] require), of which English will be inevitably one (we can perfectly assume English as “the language of business” (Tsedal, 2012)¹, or as some experts may call it, *lingua franca* in the communication of business –amongst many other domains– [Jenkins, 2007]) and the other will be the language of the country to which the good has been sold. It is possible to find the document not translated (that is to say, in plain English) when the two countries speak English officially. Given all this background, we wanted to further research about CE declaration of conformity documents, so that to illustrate with examples the different translations found in EN/ES documents. Some of them are virtually correct, but some of the mistakes found could have been perfectly substituted by better translation proposals if an official translated template –supervised by translators– had been drawn. We want to know what are the techniques and mistakes which can be easily found on these documents, and we want to sketch our own model of translation, basing our results on real corpus.

Objectives

In this study, we attempt to describe the state of the art referring to Intellectual Property, firstly, and to CE marking directives, on the other hand, in order to understand to full process in the making of a CE declaration of conformity documents. Then we want to show the different translations found in several documents of this kind. We can then assume that our objectives are the following:

- To describe the full process of CE marking and Intellectual Properties concerning international businesses and investments.

¹ English as the language of business: “Ready or not, English is now the global language of business. More and more multinational companies are mandating English as the common corporate language—Airbus, Daimler-Chrysler, Fast Retailing, Nokia, Renault, Samsung, SAP, Technicolor, and Microsoft in Beijing, to name a few—in an attempt to facilitate communication and performance across geographically diverse functions and business endeavours.” Source: Neely, Tsedal (2012). [Online: <https://hbr.org/2012/05/global-business-speaks-english>].

- To create a corpus with a consistent number of examples of CE declaration of conformity documents translated from English into different languages to illustrate the percentages per language. This way, we will be able to know which are the most frequent languages these documents are translated into.
- To consider the translation from English into Spanish of these documents, both in printed and computer-based examples.
- To classify the differences –in terms of translation– found in EN/ES documents into techniques and mistakes.
- To sketch our own proposal of translation, basing this proposal on the documents of our corpus, and considering only the translations that we, as translators, evaluate as good translation options for the given context.
- To create an impact on SMEs in order to make them aware of the importance of counting with a translator for their international interchanges if they want to avoid such translation mistakes.
- To make society understand, once more, the importance of real translation: to appreciate the work of translators, in the real business world and in general.

Methodology

Any study can be carried out without a complex process of documentation. For this study, we have looked at the information contained in different official webpages concerning Intellectual Property and CE marking in the EU, because this is the context in which CE declaration of conformity documents are drafted for this study. The webpages with a more number of examples and clarifications towards this topic and which sometimes include a full explanation of each one of the steps to be followed when carrying through the CE marking process have been the following: AENOR, the CE Marking Association, EUR-LEX, the EPO (European Patent Office), the EUIPO (European Union Intellectual Property Office), the OEMP (*Oficina Española de Marcas y Patentes*) and the WIPO (World Intellectual Property Organisation).

Once the complete process of Intellectual Property and CE marking understood, we could perfectly assume the importance that CE declaration of conformity documents played with regards to this process, and being aware of this fact is crucial to understand the limits of the traductological approach. Our

next decision was to find a total of 48 documents (of which 24 were provided to us by private enterprises [a total of 3 enterprises] which do not want to be named in this study, and whose documents were given to us printed). The rest of the documents were compiled in a computer-based corpus and were found via the Internet (many enterprises upload their own proposals of CE declaration of conformity templates in their own webpages on the internet—so they have been made visible for general public—, but considering that this is a private study, we will not mention their names either, because our goal is not to focus on which enterprises translate well and which ones do not, but to consider the real terminology employed by real enterprises in our globalised world). We have compiled then a corpus made of printed documents (which were transferred into our computer thanks to a digital OCR² tool) and computer-based documents downloaded from online templates made by Spanish and English business' enterprises. The corpus was compiled between the month of February and June of 2018, although the printed ones were all provided in the month of May 2018. The printed documents are dated on 2015 and 2016, from January to December. The online ones are more recent in time; they all are dated on December 2017 and January 2018.

In the table below we have indicated the frequency, established by language, that represent the number of documents of the corpus compiled for our study translated from English into Spanish (this is the language we are interested the most for the aims of our study), and we have included the other languages into which the documents have also been translated. The translation appeared on the same document, separated by slashes, as we will show afterwards. All of them included English as the TO (48 documents), but we have only considered the 34 documents translated into Spanish so that to consider the translation differences between these two languages. As we can see from the table below, only 25 of them were translated into German and only 23 to Italian. The rarest language found was Czech, with a total of 5 documents. If this was a sociological and/or business study, this information could be also important to consider if we took into account the following factors: localisation of the enterprise, localisation of the enterprises to which the good is sent, percentages of translation mistakes, etc. in order to know the necessity of translating into more languages or not these documents (information that we consider very important for the international business sector). This information could also be important for knowing the level of cooperation between countries and

² OCR: Acronym for *Optical Character Recognition* (Adobe Acrobat [online]: acrobat.adobe.com. Accessed on 2018-07-19).

enterprises in a concrete localisation too, and also the kind of product that provides more business opportunities amongst countries.

It is important to evaluate that from a corpus made of 48 documents, only 14 were written into just one language. The rest were all bilingual –or multilingual–, always including English.

Number of documents	Language/s involved	Frequency
14	Only English	29,16 %
48	English	100 %
34	Spanish	70,83 %
34	French	70,83 %
25	German	52,08 %
23	Italian	47,91 %
12	Portuguese	25 %
5	Czech	10,41 %

Table 1. Percentages of the languages employed in the documents of the corpus.

The table above shows therefore that all the documents used for our corpus were written originally in English but then translated into several languages, depending on the target country and the languages that are spoken in the buyer's and/or seller's country. If we take, for instance, the number 34 with regards to French, we should understand that from 48 documents, only 34 were also translated into French, and that these 34 documents translated into French were also translated into Spanish: that is why the percentage showed is the same (70,83 %). The domain of these documents concerns the industrial, the agronomist and the international market fields: this can explain the topic of the terminology used in this study.

After evaluating this information, we took the EN/ES combination and started our descriptive analysis. To do so, we identified the parts of the macrostructure of this document (in general) and then we look for all of these parts in the documents which conformed our corpus. Once we concluded this part, we started our traductological analysis, dividing each part into segments,

and we examined the segments comparing the original version, in English, with the target version in Spanish so that to clearly examine the techniques employed from the mistakes. All the techniques and mistakes were sorted and classified into a table, and we have selected the most frequent or illustrative ones in the results' section.

Once our research conducted, we drafted the conclusions, provisional for the moment, since we need further inquiries and studies which can clearly show the limits of the current study.

What is understood by the term “CE declaration of conformity”?

A CE declaration of conformity is a document in which the inventor or legal representative declares his/her conformity to the invention/product to have followed all the regulations specified in EU Directives (AENOR).

The declaration of conformity is thus a legal document which accompanies all CE products which are sold in the European Union. One important consideration is that all these products must bear the CE mark, a procedure that we will come into more detail afterwards. Any new product can be supplied without any declaration of conformity to the end user. To sum up, this document clearly states that your new product or invention meets all legal requirements to be sold or supplied. It is a summary of the technical characteristics which define it.

A CE declaration of conformity must have been written in the same language that the user's manual and must be translated into any language spoken in the end user's country, according to the specifications found in the WIPO and the EPO. This is the reason why the only language that appeared in Table 1 above without any translation included was English: the major part of the countries in Europe can speak English, but not all of them can understand Italian, for instance.

If any enterprise is to make any changes into the characteristics of manoeuvring of the new item or invention, these new considerations must be conveniently included into the declaration of conformity, even if those changes are done years after the invention was first made (EPO).

The information that this document must include is the following: name of the inventor or enterprise creating/taking responsibility for the new invention or product, as well as the address of contact; applicable safety directives the

product complies with; description of the characteristics of the new product or invention; and signature of the manufacturer or inventor (or enterprise/organisation) launching the new product.

We would like to include this brief summary drawn by the CE marking specialist webpage Conformance® to illustrate what we have already mentioned:

The declaration of conformity is a special document, which the manufacturer signs to say that the product meets all of the requirements of the applicable directives. It must be issued by the manufacturer, or by the person placing the product on the EU market if the manufacturer is not based in Europe.

Basically, it's a piece of paper, which someone has to sign to say that the product meets the requirements of the directive(s) which apply to it. The idea is that making someone put their signature on a piece of paper concentrates their mind on whether or not the product really does comply. It also allows an enforcement authority to identify who is responsible for a product and what that person claims to have done to CE mark it.

A properly issued Declaration of conformity is always issued by the product's manufacturer (or representative), importer or distributor; never by a test house or Notified Body. (Conformance®).

The Intellectual Property. A documentation process that the translator cannot forget about

The process of documentation is really important in every single translation project that the translator wants to get responsibility for (Hurtado Albir, 2011). One of the most important considerations surrounding a CE declaration of conformity document is that the enterprise should always follow two different procedures: the first one, the process of CE marking, and the second one, all Intellectual Property (IP) requirements.

We are going to start now by emphasising the most important characteristics that the translator should consider when translating one document of this type, since understanding the whole process can be hard (and even more when translating) if he/she hardly knows much about Intellectual Property, new inventions and legal requirements in this context in large.

Intellectual Property protects the new products which are to be placed on market, in any modality they can be drafted or designed.

Merriam-Webster defines *Intellectual Property* in the following terms:

1. Property (such as an idea, invention, or process) that derives from the work of the mind or intellect
2. *Also:* An application, right or registration relating to this.

Cambridge Dictionary combines some more information about the concept:

1. *Abbreviation:* IP. Someone's idea, invention, creation, etc., that can be protected by law from being copied by someone else.

Finally, we would like to draft the definition presented by the online Business Dictionary:

1. Knowledge, creative ideas, or expressions of human mind that have commercial value and are protectable under copyright, patent, servicemark, trademark, or trade secret laws from imitation, infringement, and dilution. Intellectual property includes brand names, discoveries, formulas, inventions, knowledge, registered designs, software, and works of artistic, literary, or musical nature. It is one of the most readily tradable properties in the digital marketplace.

From the information hereinabove defined, we can deduce that IP works hard in order to assure that any invention or product is conveniently protected before being marketed. When a manufacturer is to apply for a patent or to register a brand, design or product, he must apply into any of the IP Offices in order to check if the new invention is brand new or if it belongs to any other person or entity. In order to do that, it is necessary to verify a lot of information contained in different offices, maybe in several countries at a time. Thanks to some international treaties, it is no further essential to check all the information contained in all of the offices of the countries where this product is to be protected. The new procedure is easier and faster, too.

We count with several offices throughout the world: the European Patent Office (EPO), the World Intellectual Property Organisation (WIPO) and the European Union Intellectual Property Office (EUIPO). In Spain, we depend on the Spanish Patent and Trademark Office (*Oficina Española de Patentes y Marcas, OEMP*).

In each one of these organisations' webpages, the translator will find a lot of information relating to any topic he/she must get into in order to search for information that may come in useful during his/her documentation process. When translating a document of this type, these minimal considerations and pieces of knowledge are really well received, since we must understand the typology, the conventions and undoubtedly the terminology employed in each case. And sometimes, many of the answers we may be looking for can be very well highlighted in some of the webpages aforementioned, especially when it comes to requirements, legal procedures, instructions, terminology employed to describe a concrete aspect in the documentation to get fulfilled by the enterprise, legal specifications, etc. In some webpages, such as EUR-LEX, for instance, we may find the official translation in all European languages of the terminology mostly employed in this category of documents. It is also convenient to get informed about the latest requirement changes or possible modifications which may be included in any of the clauses of the document (especially if it concerns terminology or lexical fields).

The CE marking in products

In order to obtain the CE marking in our newest product or invention, six different steps are to be followed. Before being sold, many products require a CE marking, especially when they are to be sold in the EEA (the European Union, Iceland, Lichtenstein and Norway).

CE marking assures the assessment in your product and guarantees that it fulfils all EU safety requirements. It is the only mark which guarantees the conformity of the product with regards to the requirements of the appropriate EU Directive. The CE mark is drafted like this:

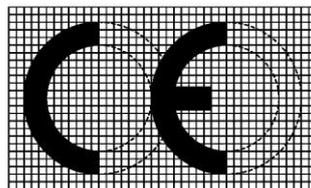


Figure I. CE mark. Downloadable from online source:
https://ec.europa.eu/growth/single-market/ce-marking_es.

The steps that manufacturers should consider are the following:

1. Identify the EU requirements and applicable directives for the product.
2. Check and verify whether the product or invention meets the requirements specified.
3. Verify if the invention or product should be tested by a Notified Body (special conformity assessment bodies).
4. Test of the product or invention and assessment of the product's conformity.
5. Compile the technical documentation dossier.
6. Proceed to make the Declaration of conformity and affix the CE Mark.

This figure, extracted from CE Marking Association®, can very well illustrate the steps to be followed during this process:

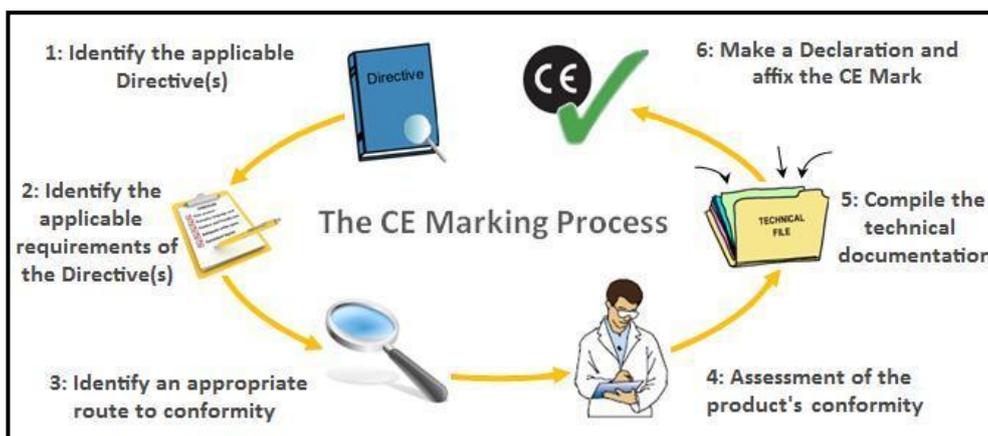


Figure II. The CE marking process. Source: <https://www.cemarkingassociation.co.uk/process/>.

A model of CE declaration of conformity document

As we have already mentioned, the CE declaration of conformity is a document in which a detailed list of technical characteristics about the product is notated. We are going to show a template of such document, in order to identify the different parts in which it is divided.

EU CE DECLARATION OF CONFORMITY	
We, the manufacturers,	1
_____ _____ _____	
(name and address of the manufacturer/company, telephone, email address)	2
This declaration of conformity is issued under the sole responsibility of the manufacturer.	
Product: _____	3
Type: _____	4
Batch: _____	
Serial number: _____	
Object of the declaration (identification of the product allowing traceability; it may include clarity where necessary for the identification of the product and include a photograph where appropriate).	5
<div style="border: 1px solid black; height: 80px; width: 100%;"></div>	
The object of the declaration described above is in conformity with the relevant Community harmonisation legislation:	6
_____ _____	
References to the relevant standards used (or references to the specifications in relation to	7

which conformity is declared): _____ _____	
Where applicable, the notified body (name, number) performed (description of intervention) and issued certificate (certificate number). _____ _____	8
Digit notified body number: _____	
Additional information: _____	9
Signed for and on behalf of (responsible person): _____	
Place/Date of issue: _____	
Name, function, signature: _____	10
<i>Note: Always refer to the applicable Product Legislation for the specific requirements for the Declaration.</i>	

Figure III. A template in English of a CE Declaration of Conformity document.

As we have proved from the template above, there are at least ten different parts in which a document like this can be divided into:

1. Identification of the manufacturers.
2. Name and address of the manufacturer (and his authorised representative, if applicable).
3. Identification of the product.
4. Statement: *This declaration of conformity is issued under the sole responsibility of the manufacturer.*
5. Object of the declaration (*identification of the product allowing traceability with the possibility of including a photograph if it is required*).
6. Statement: *The object of the declaration described above is in conformity with Directive _____.*
7. References to the relevant performance requirements and test standards in relation to which conformity is declared.
8. Statement: *The notified body (...) performed a (...) conformity assessment procedure and issued the certificate (...).*
9. Additional information.

10. Signature (signed for and on behalf of), place and date of issue.

If the product is to be sold in a country (or countries) where a language different from that of the manufacturer's country is spoken, a translation must be included (WIPO, 2018). As we have observed from corpus, the pattern is to differentiate one language from the other by using a slash (/). We have not found any case in which a new document has been elaborated for each of the translations.

We are going to propose now a template of what a CE declaration of conformity translation may consist of, basing our translation in several parallel and comparable texts from corpus. In this case, we have chosen a Spanish demonstration, as if the product to be placed on market where to be sold both in the UK and Ireland (for instance) and Spain.

EU CE DECLARATION OF CONFORMITY DECLARACIÓN CE DE CONFORMIDAD UE	
We, the manufacturers, / El fabricante,	

(name and address of the manufacturer/company, telephone, email address / nombre y dirección del fabricante/empresa, teléfono, dirección de correo electrónico)	
This declaration of conformity is issued under the sole responsibility of the manufacturer. / Declara bajo su responsabilidad el producto detallado.	
Product / Producto:	_____
Type / Modelo:	_____
Batch / Lote:	_____
Serial number / Número de serie:	_____
Object of the declaration (identification of the product allowing traceability; it may include clarity where necessary for the identification of the product and include a photograph where appropriate). / Objeto de la declaración: identificación clara del producto para proceder a su	

A translation approach to *CE declaration of conformity* documents

trazabilidad. Se adjuntará una foto del mismo en aquellos casos en los que sea necesario.

The object of the declaration described above is in conformity with the relevant Community harmonisation legislation: / El objeto de la declaración precedente está en conformidad con las disposiciones de las Directivas europeas siguientes:

References to the relevant standards used (or references to the specifications in relation to which conformity is declared): / Referencias de las normas armonizadas aplicadas (o referencias de las especificaciones de conformidad pertinentes):

Where applicable, the notified body (name, number) performed (description of intervention) and issued certificate (certificate number). / Si procede, el Organismo Notificado (nombre, número) ha emitido el Certificado de examen CE de tipo número (descripción) y ha expedido el certificado de examen CE con el número (número del certificado).

Digit notified body number / N.º de identificación del Organismo Notificado: _____

Additional information / Información complementaria: _____

Signed for and on behalf of (responsible person) / Firma: _____

Place/Date of issue: _____ / Firmado en _____, a _____

Name, function, signature / Nombre, cargo y firma: _____

Figure IV. A template in English and Spanish of a CE Declaration of conformity document.

In order to translate into Spanish the above document, we have used a corpus of 34 different documents translated into Spanish, so that it is been convenient for us to make use of parallel and comparable corpora so that to identify each section with the corresponding (and usual) translation in Spanish. This is our proposal of translation, basing this model in the corpus employed for this study and taking into consideration only the segments which we may well evaluate as good options for the translation required.

From the information of such corpus we can perfectly identify that a word-by-word translation is not always issued. There are some structures whose translation is made equal (or calqued), but in the major part of the cases, the TT (translated text) and the ST (source text) does not coincide.

A couple of differences have been identified, though:

Title	<p><i>EU CE DECLARATION OF CONFORMITY DECLARACIÓN CE DE CONFORMIDAD UE</i></p>
Statements	<p>Location of “UE/EU”: beginning/end of sentence. <i>We, the manufacturers / El fabricante</i></p> <p>Whereas a “we” (first-person plural) subject is employed in English, a noun phrase is used in Spanish.</p>
	<p><i>This Declaration of Conformity is issued under the sole responsibility of the manufacturer. / Declara bajo su responsabilidad el producto detallado.</i></p> <p>A passive voice structure, with “This declaration” as subject, is employed in English. In the Spanish version, the verb “declarar”, “to declare” in English, is employed instead of the noun phrase “declaración”, which would have been the word-by-word translation. Under the assumption of the verb “declarar”, the Spanish version understands that it is referring to the Declaration of Conformity.</p>
	<p><i>[...] the relevant Community harmonisation legislation / [...] las disposiciones de las Directivas europeas</i></p> <p>The noun “Community” has not been translated by “Comunidad” or “Comunidad Europea”, but by “europeas”, referring to the “legislation”, “Directivas” in Spanish: “Directivas europeas”.</p>
Functional translations	<p><i>Where applicable / Si procede</i></p> <p>A word-by-word translation would suggest nothing to the Spanish version. Thus, a functional translation should be employed so that the recipient of the TT can understand the context and meaning of that phrase.</p>

Verb tenses	<p><i>Performed [...] and issued [...] / ha emitido [...] ha expedido [...]</i></p> <p>A past simple form of the verbs “to perform” and “to issue” has been employed in English. In Spanish, this kind of typology may prefer present-perfect tenses to past simple ones: “ha emitido” (ES) > “has performed” (EN); “ha expedido” (ES) > “has issued” (EN).</p>
--------------------	---

Results: translations mistakes, differences and techniques found in real documents

We have found several translation differences concerning documents of EU CE declarations of Conformity. Although a template example in EU webpages has been forwarded into European languages, as we mentioned before this kind of document does not have to be completed upon an official template. Each enterprise, depending of the specifications and requirements which must identify upon the product must compile its own model. It is possible to include the logo or trademark of the enterprise, especially when the enterprise is to attach several documents concerning its product to several official documents (EPO).

In this table we have highlighted the most noticeable translation differences from English to Spanish (or viceversa) relating to declarations of conformity. The mistakes into which we have come have to do with grammar, spelling, translation, linguistics or punctuation. As the corpus has been compiled using different templates and official documents from private enterprises, the details of contact of such enterprises will not be provided in order to assure their privacy of data.

Word-by-word translation and calques	<p><i>DECLARA QUE EL DISEÑO Y FABRICACIÓN DE LA MÁQUINA (ES) / declares that the design and construction of the machine (EN)</i></p>
Word-by-word translation and calques	<p><i>Por la que se modifica la Directiva de Máquinas en lo que respecta a la máquina para la aplicación de plaguicidas (ES) / Amending Machinery Directive with regard to machinery for pesticide application (EN)</i></p>

A translation approach to CE declaration of conformity documents

	<p>The use of capital and small letters in this example does not coincide either.</p> <p><i>We, the manufacturers (EN) / Nosotros, los fabricantes (ES)</i></p> <p><i>We declare under our sole responsibility for the equipment (EN) / Declaramos bajo nuestra sola responsabilidad para el equipo (ES)</i></p>
Use of capital letters and small letters	<p><i>ES CONFORME A LAS DISPOSICIONES DE LA DIRECTIVA DE MÁQUINAS (ES) / complies with the regulations of the MACHINERY DIRECTIVE (EN)</i></p> <p><i>Is in conformity with the provisions of the following Directives (EN)/ Es conforme a las disposiciones de las Directivas (ES).</i></p> <p>The word “following” is not present in the Spanish version either.</p>
Elision of elements	<p><i>DECLARA QUE EL DISEÑO Y FABRICACIÓN DE LA MÁQUINA (ES) / declares that the design and construction of the machine (EN)</i></p> <p><i>RoHS Restriction of certain Hazardous Substances in electric and electronic equipment (EN)/ Directiva RoHS (ES).</i></p> <p>In English, the complete name of the “RoHS” Directive has been developed, so that any reader can understand the meaning of the acronym “RoHS”.</p>
Linguistic amplification	<p><i>Ecodesign (EN) / Diseño ecológico (ES)</i></p>
Naturalisation	<p><i>Certified on the (EN) / Certificado el día (ES)</i></p>

False sense	<i>That the equipment is in conformity with the following relevant Union harmonisation legislation (EN) / Que el equipo está en conformidad con la siguiente armonización legal relevante de la Unión (ES)</i>
	<p>It is not a “legal armonisation” that the text is talking about (“armonización legal”, as Spanish version suggests), but “relevant Union harmonisation legislation”.</p> <hr/> <p><i>Certificate number (EN); certificado y número (ES).</i></p> <p>It is not the same concept: whereas “certificate number” refers to “certificado número ..” or “número de certificado” in Spanish, the Spanish version offers two possibilities here, as if the original version said “certification” on the one hand and “number” on the other hand.</p>

Setting the limits of the results

It is important to emphasize that the major part of the mistakes and translation differences hereinabove mentioned are probably due to the excessive use of professional translator’s substitute tools which, employed beyond the goals for which they were created, provide us with results with no high standards of quality parameters, at least as expected –and which with no doubt would a professional of our sector provide any enterprise with.

On the other hand, the techniques employed, such as naturalisation or linguistic amplification, are, in our opinion, very well justified, offering quality results in the target text. Notwithstanding, calques –both syntactic or terminological–, literal translations –without justification– and false senses show a great deal of both source and target language knowledge lack, since if the writer of the text had some knowledge of them, many of the undue translation mistakes found in the sentences of CE declarations of conformity may have been elided.

Provisional conclusions

Even though this document is a non-uniformed template made by any EU organisation, it is important that enterprises do revise the results and consult documentation strategies so that they can offer much better quality results. Only a well documented translator will be able to employ the best expressions depending on the context, and only this will guarantee the complete confection of a document of this kind, with such big importance for global enterprises, consumption and consumers. We highly emphasize the importance that translation plays in this regard, since this type of document shows to consumers the minimal requirements of products before being placed on marketplaces, so it is due that all the information contents are very well understood.

In conclusion, when writing official documents which are very recurrent by enterprises of a concrete sector, we should not have to rely on a translation made intuitively or throughout IT or computer-based programmes which do not proofread the extent of the work done. When we deal with a document like this, a CE declaration of conformity, so recurrent amongst enterprises, it is important to count with a template (modifiable for each one of the languages for which the product is intended to be placed on market) of intended quality, duly justified and proofread by translators, since being done otherwise will end up by a notion of non-quality, something which does not convene to enterprises with a distinction place in business rankings.

An extensive process of documentation is thus expected from the translator. We highly demand to enterprises to consider these points of view, since using CAT tools online without the supervision of a professional of language will end up in calques and word-by-word translations that will suggest nothing to the end recipient (and the goal of translating this document is not to proceed with the regulations and legislations –being translated because it is the law– but for the whole understanding between companies, enterprises and people. And consumers all around the world, of course).

On the other hand, the commission of some faults such as false senses or literal translations suggests a lack of documentation by the translator or a lack of knowledge of the language employed in the translation.

Language is, as always, the best letter of motivation, and the use that each one of us do of her will revert to various consequences; in this domain, of financial and business nature. Avoiding such mistakes is a crucial key point for enterprises, because their work and relationship amongst companies and with their clients depend very much on it. Once more, we highlight the importance that translation plays in our globalised world, not only with regards to businesses, but also —and especially— to our society. And this is something that we all should value the most.

References

- AENOR. [Online]: <https://www.aenor.com/>. [Accessed on: 2018-09-05].
- AENOR: *Marcado CE: Acceso al mercado Europeo*. [Online]: <https://www.aenor.com/certificacion/marcado-ce>. [Accessed on: 2018-09-05].
- BUSINESS DICTIONARY [Online]: <http://www.businessdictionary.com/>. [Accessed on: 2018-09-03].
- CAMBRIDGE DICTIONARY [Online]: <https://dictionary.cambridge.org/es/>. [Accessed on 2018-09-03].
- CE MARKING ASSOCIATION.[Online]: <https://www.cemarkingassociation.co.uk/process/>. [Accessed on: 2018-09-16].
- CONFORMACE (*sine dato*): *Declaration of conformity*. Conformance, the CE marking specialists. [Online]: <https://www.conformance.co.uk/our-services/Declaration-of-conformity-ce-marking>. [Accessed on 2018-09-02].
- DIRECTIVAS 2006/42/CE, 2009/127/CE, 2014/33/UE Y REGLAMENTOS (CE) 596/2009 Y (UE) 167/2013 *via* EUR-LEX. [Online]: <https://eur-lex.europa.eu/legal-content/ES/TXT/?uri=LEGISSUM%3A121001>. [Accessed on:2018-09-10/15].
- EUR-LEX [Online] :. <https://eur-lex.europa.eu>. [Accessed on: 2018-09-05].
- EUROPEAN PATENT OFFICE (EPO) [Online]: <https://www.epo.org/index.html>. [Accessed: 2018-08-14].
- EUROPEAN UNION INTELLECTUAL PROPERTY OFFICE (EUIPO). [Online]: <https://euipo.europa.eu/ohimportal/es>. [Accessed on: 2018-08-01].
- HURTADO ALBIR, A. (2001): *Traducción y Traductología: introducción a la traductología*, Madrid: Cátedra.

- JENKINS, JENNIFER (2007): *English as lingua franca: attitude and identity*, Oxford, GB, Oxford University Press, 296pp.
- MARTÍNEZ MUÑOZ, OLGA (2006): *La calidad en los materiales de construcción: CE. ¿Por qué llamarlo marca cuando en realidad es un marcado?*, Colegio Oficial de Aparejadores y Arquitectos Técnicos: Madrid, IETCC Artículos.
- MERRIAM-WEBSTER DICTIONARY [Online]: <https://www.merriam-webster.com/>. [Accessed on 2018-09-03].
- NEELY, TSEDAL (2012): *Global Business speaks English*, Harvard Business Review. [Online]: <https://hbr.org/2012/05/global-business-speaks-english>. [Accessed on: 2018-08-27].
- PATENT AND TRADEMARK OFFICE (OFICINA ESPAÑOLA DE PATENTES Y MARCAS, OEMP). [Online]: <https://www.oepm.es/es/index.html>. [Accessed on: 2018-08-14].
- WORLD INTELLECTUAL PROPERTY ORGANISATION (WIPO). [Online]: <http://www.wipo.int/portal/en/index.html>. [Accessed on: 2018-08-01].
- YOUR EUROPE. EUROPEAN UNION. [Online]: https://europa.eu/youreurope/business/product/cemark/index_en.htm. [Accessed on: 2018-08-01].