



ASSOCIATION OF LINGUISTIC  
SERVICES MANAGERS

## Committee for the Promotion of Canadian Language Services

Montreal, November 1, 2016

The Honourable Judy M. Foote  
Minister of Public Services and Procurement  
11 Laurier St.  
Place du Portage, phase III  
Suite 18A1  
Gatineau QC K1A 0S5

Re: Response to your letter dated October 17, 2016, regarding the recommendations made in the Report of the Standing Committee on Official Languages (May 2016)

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Dear Minister Foote:

The Association of Linguistic Services Managers (ALSM), through its Committee for the Promotion of Canadian Language Services, reviewed the official response from the government on October 17, 2016, to the recommendations made in the Report of the Standing Committee on Official Languages.

The ALSM is deeply disappointed after receiving your response because it unfortunately does not in any way address the concerns raised by the ALSM's Committee in the letter we sent to you on September 15, 2016, that was backed by eight major pan-Canadian language-industry associations. It does not resolve any of the issues raised by the witness and by the members of the Standing Committee and fully maintains the status quo.

However, that status quo is very detrimental to the Canadian translation industry, which plays a crucial role in Canadian society and its economy. As such, not only does the Canadian translation industry enable Canadian exporters to meet the languages requirements set by the countries where they sell their products and services; it also helps the federal and provincial governments completely fulfill their official languages obligations.

It is those very obligations that make the federal government the biggest translation client in Canada, by far. Unfortunately, transforming the Translation Bureau (TB) into a Special Operating Agency (SOA) led to

decentralization of the contracting authorities in translation to all federal departments and agencies. That decentralization has resulted in the fragmentation of the Canadian translation industry, which jeopardizes its very existence.

The TB is trying to counteract this fragmentation, but is being undermined by the contracting practices of the federal departments and agencies. Contrary to what you state, Madam Minister, those departments and agencies are entrusting it with much less than 80% of their translation request, as indicated in the reports they submitted in response to parliamentary question no. Q-53 posed by a member of the Standing Committee. In this context, there is every reason to doubt the statement that “the direction of the organization [TB] will enable it to manage costs for the government”.

It is high time to put a stop to these anarchic and counter-productive practices and to once again put the federal purchasing power of translation into the hands of the expert organization that the Government of Canada created, ie. the TB.

With regard to strengthening the partnership with the private sector, the redesign of the TB’s procurement process opened up our markets to the invasion of foreign multinationals and led to the proliferation of agencies and freelancers, some not being competent, that compete with each other on bid solicitations for small- and medium-sized jobs. Conformity to an independent certification should be the basis for procurement policy and practices among purchasers of translation services. For instance, the CAN/CGSB-131.10-2008 certification should help address this issue.

While industry stakeholders are waging a merciless price war, the TB often invites over 20 providers, sometimes even more than 100, to respond to the same bid solicitation, forcing them to quote laughable rates that jeopardize many well-established Canadian translation agencies. Such an approach casts a bleak outlook for the next generation of Canadian job seekers.

Furthermore, the TB prohibits a per-word rate exceeding two decimal figures. For example, a provider cannot quote a rate of \$0.305 per word; it must be \$0.30 or \$0.31, making it nearly impossible for it to distinguish itself from other providers. The result is often that competitors come out even. In that scenario, if their respective quality indices are equivalent, the TB resorts to a random draw to determine the winner, a method that has no place in the public service.

For all standing offers, the burden of risk is entirely on the providers, because the TB guarantees only 3% of the volume indicated in the contract. Moreover, the TB often allots more time for its own internal and costly quality control than it gives to its providers for the translation, a nonsensical approach that is counter to industry best practices. Lastly, there is no unbiased arbitration process in place in the event of disputes over quality-related matters.

We are also concerned about the absence of language professionals from the TB at forums organized for the industry by none other than...the TB. The latter, which is responsible for protecting the industry, needs to bring some of its professional translators at the table so that all participants have a clear understanding of the issues and so the measures taken benefit both the private and public sectors. It is also surprising that there is no language professional among the TB’s senior management.

With regard to new translators, it is abundantly clear that no action is being taken, despite the recommendations made in the Report of the Standing Committee on Official Languages, which set out clear, concrete measures to support the next generation of translators coming into the market. The TB, which took in hundreds of students for several years for training internships, is now largely absent. The 19 translation interns who were received in 2016 are a paltry figure compared to the number of students enrolled in Canadian schools of translation. Each year, universities award degrees to hundreds of new translators and can rely only on translation agencies and private companies to take in interns and students from cooperative programs. Those same companies, already facing fierce competition and a downward spiral of rates, cannot take on all interested students. Practical experience in the workplace, in a highly technological environment and in increasingly technical areas of specialization, is crucial. The TB needs to play a leading role in training new translators by becoming and establishing, together with universities, a permanent structure for taking in interns.

In short, with the status quo, the TB continues to be relegated to the role of a mere administrative service, whereas its scope must be far broader and encompass strategic, economic and cultural considerations. Beyond its concrete economic role, this organization plays a crucial role in preserving Canada's social fabric. It is not an overstatement to say that, without translation, the country simply would not exist in the form that we know it as today. In fact, according to 2011 data from Statistics Canada, 82.5% of Canadians claim to be unilingual. How can these millions of Canadians interact with their fellow citizens across the country without the help of professional translators? It is simply impossible. That means that by relegating the TB to a secondary role, the government is also impeding the social cohesion that comes from an understanding of country's different cultural realities. Lastly, professional translation is a driver of growth for all Canadian companies that export or import products and services. By favouring the status quo, the government is therefore hindering the various Canadian economic players, first and foremost, the translation industry.

Our letter presents only some of the issues that would result from maintaining the status quo. That is why we are requesting a meeting so we can describe to you in greater detail the harmful consequences of underutilizing the structuring potential of the TB and present you with concrete, lasting solutions for this industry of national importance.

Sincerely,



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c.c.           The Right Honourable Justin Trudeau, Prime Minister of Canada  
              The Honourable Denis Paradis, Chair of the Standing Committee on Official Languages and  
              MP for Brome-Missisquoi  
              Acting Heads, Translation Bureau, Public Works and Government Services Canada  
              The Honourable François Choquette, MP for Drummond, and Critic for Official  
              Languages, NDP

The Honourable Scott Brison, President of the Treasury Board  
Mr. Graham Fraser, Commissioner of Official Languages



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## Committee for the Promotion of Canadian Language Services

### Support from major stakeholders in the language field

#### **CANADIAN TRANSLATORS, TERMINOLOGISTS AND INTERPRETERS COUNCIL (CTTIC)**

*Golnaz Aliyarzadeh, President*

#### **ASSOCIATION CANADIENNE DES JURISTES-TRADUCTEURS (ACJT)**

*Me Louis Fortier, Cert. Tr., Cert. Adm., President and consultant-lobbyist*

#### **LANGUAGE INDUSTRY ASSOCIATION (AILIA)**

*Sharon Steinberg, President*

#### **CORPORATION OF TRANSLATORS, TERMINOLOGISTS AND INTERPRETERS OF NEW BRUNSWICK**

*Jeff Staflund, President*

#### **NETWORK OF TRANSLATORS IN EDUCATION (NTE-RTE)**

*Anne-Marie Mesa, President*

#### **ASSOCIATION OF TRANSLATORS AND INTERPRETERS OF ONTARIO (ATIO)**

*Philippe Ramsay, President*

### Public figures

**Mr. Jean Delisle**, Professor, University of Ottawa

**Mr. Charles Le Blanc**, Professor, University of Ottawa

**Mrs. Chantal Gagnon**, Professor, Université de Montréal

**Mr. Jean Quirion**, Director, School of Translation and Interpretation, University of Ottawa (support received on 2016-11-25)



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### M E M B E R S

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