

Translation for the Safety Industry

By S. Mitchell Donaldson

By the very nature of the SH&E industry, it is understood that research must be done and regulations must be followed in order to market and sell products domestically. However, when it comes to promoting such goods in the global marketplace, it becomes exponentially complex.

What can often be taken for granted, such as the meaning of international warning signs without text and the educational levels of end users, can become a major consideration in developing countries where machine workers may not necessarily be able to infer in what capacity potential dangers lie.

In addition, while most countries have laws mandating testing standards, some regions and countries have requirements specifically regarding translation of labels, manuals and sales literature.

International Communication by Design (ICD) recently completed the translation of a safety manual for a hydraulic technologies company into several European languages. Although the source version was written in English, it originated from the company's Netherlands branch and was written with consideration of the Machinery Directives 2006/EC/42, found in the *Official Journal of the European Union (OJ)*, and CE Markings requirements (to be discussed, in detail, shortly).

This manual not only references safety standards such as EN982:1996, EN983:1996, ASME B30.1, ASME 40.1, IJ100, CSA, NEMA and WEEE, but it also explains what the abbreviations stand for. Also, warning symbols are accompanied by brief but descriptive text to alert users to safety criteria.

In terms of creating translation-ready materials, ICD's client has the advantage of its Dutch office providing the source documents; because of their familiarity with European regulations and requirements, workers in that office are cognizant of what needs must be considered to produce quality manuals for use in neighboring states.

OJ Translation Directives

OJ lays out the directives for machinery sold and used in European member states. The document can be found at

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2006:157:0024:0086:EN:PDF>.

The directives for translations of warning labels and instructions found in OJ L157/47 of June 9, 2006, follow:

•1.7.1 Information and warnings on the machinery

Information and warnings on the machinery should preferably be provided in the form of readily understandable symbols or pictograms. Any written or verbal information and warnings must be expressed in an official Community



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language or languages, which may be determined in accordance with the Treaty by the Member State in which the machinery is placed on the market and/or put into service and may be accompanied, on request, by versions in any other official Community language or languages understood by the operators.

•1.7.4. Instructions

All machinery must be accompanied by instructions in the official Community language or languages

of the Member State in which it is placed on the market and/or put into service.

The instructions accompanying the machinery must be either "Original instructions" or a "Translation of the original instructions," in which case the translation must be accompanied by the original instructions.

•1.7.4.1. General principles for the drafting of instructions

a) The instructions must be drafted in one or more official Community languages. The words "Original instructions" must appear on the language version(s) verified by the manufacturer or his authorized representative.

b) Where no "Original instructions" exist in the official language(s) of the country where the machinery is to be used, a translation into that/those language(s) must be provided by the manufacturer or his authorized representative or by the person bringing the machinery into the language area in question. The translation must bear the words "Translation of the original instructions."

c) The contents of the instructions must cover not only the intended use of the machinery but also take into account any reasonably foreseeable misuse thereof.

d) In the case of machinery intended for use by nonprofessional operators, the wording and layout of the instructions for use must take into account the level of general education and acumen that can reasonably be expected from such operators.

To further comply with translation objectives in the European Union, related marketing materials must contain information consistent with those of user manuals, as evidenced here:

•1.7.4.3. Sales literature

"Sales literature describing the machinery must not contradict the instructions as regards health and safety aspects. Sales literature describing the performance characteristics of machinery must contain the same information on emissions as is contained in the instructions."

continued on page 74

To meet these requirements, it is a best practice to have technical writing departments collaborate with marketing departments to ensure that there is no discrepant text going into respective documents.

Another way to catch this is through use of computer-assisted translation (CAT) tools. Typically used in the translation and localization industry, CAT tools feature translation memories, which store previously translated content and maintain consistency in subsequent translations. When an inconsistency is picked up during the text translation process, it is flagged and alerts the translator. Naturally, inconsistencies can occur as a matter of course, but should they concern target market rules, these will be addressed with the client, by the translation agency, for rectification and compliance.

Medical Devices

Although the directives found in *OJ* apply to most European countries, Switzerland has some unique mandates concerning medical device products. These can be found at www.swissmedic.ch/php/modules/leitfaden/leitfaden.html?lang=en.

With regard to translation requirements, the following information, found on the Swissmedic, Swiss Agency for Therapeutic Products website, must be noted:

•2.4. Product information

The term *product information* covers not only instructions for use but also markings on packaging and products. The minimum content and the essential requirements are defined in European directives and must also be complied with in Switzerland.

For sale in Switzerland, the full product information must be given in the German, French and Italian languages. Deviations from this requirement are permissible in two cases only: For custom-made devices and for devices that are delivered solely to professionals. The safety of the persons involved must be guaranteed in all cases. Users must, therefore, understand the information in the language that is provided and they must agree with it.

In addition to the manufacturer,

the [party] responsible for placing the product on the market who is located in Switzerland (or in a country with which Switzerland has an agreement) must also appear.

Danish directives specify that anything longer than two words requires Danish language translations. Additional requirements for the use of the Danish language for medical device use in Denmark can be found on the Danish Medicines Agency website at www.medicaldevices.dk/1024/visArtikel.uk.mu.asp?artikelID=3888.



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CE Marking Requirements

Another consideration that goes hand-in-hand with directives such as those in the European Union is CE Marking requirements. As testing standards vary worldwide, it is a best practice to provide explanations of these standards for source text intended to be translated for specific target markets, particularly in marketing collateral.

An example of this is a marketing piece for safety gloves, currently being translated by ICD, which explains the Level 5 CE Marking rating for blade cut protection standards.

Europe uses the EN388 standard for glove performance. Regulated by the European Standardization Committee, tests include a cut (“coup”) test, involving a consistently weighted circular blade, moving in a back and forth motion. However, gloves enforced with

materials such as fiberglass and steel can dull the blade and not adequately protect the hands in uncontrolled conditions.

In the U.S., evaluations are based on the American Society for Testing and Materials (ASTM) F1790, standard, which uses testing similar to those in ISO13997. Varyingly weighted flat-edge/razor type blades moving in a back and forth motion at a constant speed are used in this method and the distance the blade travels is measured before cutting through the material.

The EN388 standard does not require an alternate ISO test. As such, confusion can occur in global markets as the definition of CE Level 5 glove specifications can vary in different jurisdictions. To this end, testing standards, with explanatory text, should be used (and translated) for target audiences. When cut- and puncture-resistant gloves are marketed to Japan, it is important to note Japanese Industrial Standards in user guides and advertising. Thus, text intended for release on a global scale should be modified to reference testing methods applicable to certain countries.

Since it is general policy for SH&E companies to maintain consistency in terms of documentation procedures, it is also prudent to keep records of translation directives and requirements for easy reference. In addition to sharing knowledge of these directives and requirements with technical writing and marketing departments, it is equally crucial that the two divisions share specification information so that instruction manuals and sales literature complies with EU translation directives.

Conclusion

This article provided a survey of SH&E regulations that affect the content and translation of product documents. To help ensure that documentation adequately protects users and meets regulatory requirements of the target market, one should fully research all applicable standards in the countries where it will be used.

S. Mitchell Donaldson is business development manager, International Communication by Design Inc. (ICD). With fluency in Mandarin Chinese and French, coupled with background as an account executive for a language service provider, he has solid expertise in understanding the complete localization process, identifying client needs for translation, and ensuring that client requirements are met. He also consults customers on cultural issues, particularly those pertaining to the Chinese market. Learn more about ICD at <http://icdtranslation.com>.