

# **FIT EUROPE**

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**FEDERACIÓN INTERNACIONAL DE TRADUCTORES  
FÉDÉRATION INTERNATIONALE DES TRADUCTEURS  
INTERNATIONAL FEDERATION OF TRANSLATORS**

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Dear Member of the European Parliament,

We are contacting you to relay the concerns of freelance professionals across the translation and interpreting sector in the face of recent commercial and industrial developments in artificial intelligence (AI), platform work, fair work and collective bargaining, and to put forward our views on how we believe the EU can and should respond.

We are a working group formed under the umbrella of FIT Europe to address concerns and issues relevant to the entire community of translators and interpreters. The working group has nine members, all professional translators and/or interpreters, each from a different European Member State.

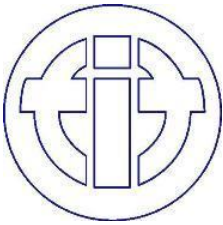
FIT Europe is the European Regional Centre of FIT, the International Federation of professional associations of interpreters, translators and terminologists. FIT Europe represents 40,000 members of 77 member associations in 33 countries across Europe. It is estimated that there are at least five times as many translation and interpreting professionals, i.e. 200,000, working in Europe (Eurostat: 180,000 in 2018).

Translation and interpreting professionals in Europe have always played a crucial role in multilingual communication and in fostering understanding between people. Over time, the translation and interpreting community has helped build the idea of a shared Europe based on common values. Our work has helped lay the foundation for a cohesive yet diverse community, a community which is united in diversity, as the motto of the European Union so rightfully states.

The increasing unregulated use of machine translation, AI and platforms in recent years is leading to 'uberisation' across the industry, lower quality and lack of experienced oversight of translation, erosion of qualification requirements, lack of skills transfer between generations of translation and interpreting professionals and resulting loss of skills. It has also severely eroded our working conditions, despite the fact that translators and interpreters are highly skilled professionals who require lengthy study and apprenticeship periods.

According to the recent European Language Industry Survey 2024 (ELIS), freelance translators and interpreters are increasingly exposed to precarity. Against the backdrop of the global economic climate, the cost of living crisis and the rise of AI, incomes have been falling for years as stress levels have risen. Our financial position continues to deteriorate across all professions and levels of seniority in the sector. For many translators and interpreters, the sustainability of our freelance activity is a pressing issue. Skilled, qualified, experienced professionals are questioning their future in the industry altogether and many are now seeking employment elsewhere.

The typical translator and/or interpreter is female: women make up 79% of our workforce, sometimes working part-time to juggle family and other commitments. For 70% of independent language professionals, freelance language work is their full-time activity. Of the 30% that work freelance on a part-time basis, two thirds list it as their main occupation.



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EU institutions use public procurement contracts to buy services, works and goods. Most outsourcing by EU institutions is via tenders, almost invariably awarded to intermediaries, generally large language service providers (LSPs), who are free to impose terms and conditions on their subcontractors, i.e. freelancers. Individual freelancers are further prohibited from participating in more than one tender or from undertaking work for more than one EU institution, which further restricts their ability to earn an income.

According to a report by Politico,<sup>1</sup> European Commission spending on translation increased from €26.5 million in 2012 to €35.8 million in 2023. The increase mostly benefited external translation services, as the share of outsourced translation rose from 26% of the Directorate-General for Translation's (DGT) total output in 2013 to 36% in the first quarter of 2023. The translation unit of the European Commission has shrunk 17% over the last decade while its use of machine translation has expanded. At the same time, the proportion of translations outsourced to external providers rose from 26% to 37%. The number of documents translated rose to 28.3% between 2013 and 2022. Fewer permanent translators are dealing with the expanded workload: staff numbers in the Commission's unit dedicated to translation fell from around 2,450 in 2013 to around 2,000 in 2023.

The European Commission (EC) Directorate-General for Translation has recently awarded a massive contract, TRAD23, for translation services. It comprises 50 lots, with estimates of pages to be translated annually ranging from 1,000 to a maximum of 65,000 per year depending on lots. The average cost per page of internal translation in 2003 was 150 euro at the Parliament and at the Commission, and 254 euro at the Council. Twenty years later, the TRAD23 lots were awarded at prices ranging from 65 euro to 12.50 euro. No wonder the Special Report concludes that "the quality of internal translation is recognised to be higher".<sup>2</sup>

**We demand that the EU include requirements for fair treatment and fair compensation of freelancers in all its tenders going forward.**

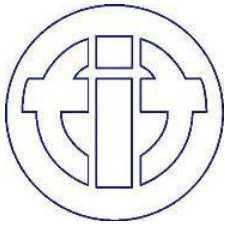
Young translators are bearing the brunt of automation, as entry-level jobs at the Commission have decreased despite the increased workload. As more people are retiring than are being hired, younger entrants have fewer opportunities than previous generations. The annual number of new translator recruitments dropped from 112 in 2013 to 59 in 2022 according to Politico.

No wonder there is a lack of interest among young people in translation and interpreting as a career. Younger professionals in particular face great difficulties given the lack of a clear path to lucrative long-term employment in line with the high level of qualifications and experience required to perform translation and interpreting tasks to a high level. Universities are reporting a further drop in student numbers as fewer students enrol on master's degree courses in interpreting and translation.

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<sup>1</sup> <https://www.politico.eu/article/translators-translation-european-union-eu-automation-machine-learning-ai-artificial-intelligence-translators-jobs/>

<sup>2</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX%3A52006SA0009>



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The ELIS survey also noted the lack of internships available to EMT students across Europe. This potential shrinkage could be due to a combination of factors, including consolidation in the sector and market nervousness.

The European Union's digital strategy urges young people to consider a future in the language industry and claims to foster a human-centred vision but has enthusiastically embraced the AI hype and is ignoring the concerns of translators and interpreters about the effects of AI, the rise of platforms and other developments on translation and interpreting quality and on working conditions in the sector.

## AI

Big tech companies have built large language models (LLMs) based on translations by translators and interpreters, and are profiting massively from these, while fewer and fewer translators and interpreters are managing to make an income from their highly complex, highly skilled and creative work.

Consolidation among LSPs across the sector is leading to ever bigger corporations and increasingly widespread AI use, with the risk of an emerging oligopoly or monopoly ownership of AI systems built on private LLMs (built on translators' copyrighted material).

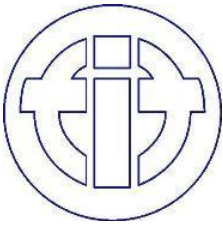
AI and machine translation are reducing the performance of highly complex, creative linguistic tasks by a qualified, skilled and experienced professional to a sequence of highly automated and repetitive processes. Often, such processes are performed by new entrants to the profession who are less costly. However, they also generally have less experience and this has repercussions in terms of quality.

With increased automation across the translation chain, quality monitoring is reduced in large part to automated metrics, where what is automated is what is measured, and only what is measured is ascribed assigned value. When it comes to ensuring quality of communication, there is less and less human input or room for human insight in terms of how content is communicated and of the effectiveness, faithfulness and accuracy of message transfer. The dangers of AI include priming bias (the tendency to be influenced by the first option available), self-pollution (machine learning from itself), linguistic profiling and standardisation, and use of hegemonic languages as bridge languages to the detriment of minority languages.

At an online event FIT Europe's Chair John O'Shea recently warned about the danger of the 'illusion of fluidity' in AI-generated translations, underscoring the need for this technology to be used solely under the control of highly-skilled translation and interpreting professionals. These professionals must have the freedom to choose when and how to use machine translation and AI.

There is a need for more transparency on how the data on which LLMs were built were sourced. Some of these corporations have scraped the web and other sources for data mining purposes. Others have built their own internal private LLMs based on human translations collected over decades, with no regard for copyright or consent, despite the fact that these translations (and interpretations) are protected as original works under the Berne Convention.

Transparency should be imposed on all AI systems used for translation, interpreting and educational purposes, not just those considered 'high-risk'. The EU needs to break open the black box of AI by requiring



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these corporations to disclose detailed information on the data sources used to pre-train and train LLMs. We contend that this is already required under existing EU data protection and copyright law. Under the AI HLEG ethics guidelines, human agency and oversight must also be a key part of any use of AI.

**We demand that our intellectual property be protected, that fair compensation be provided for use of copyrighted material, that the use of copyrighted material without consent be prohibited and that professionals seeking justice do not find themselves left alone in an unequal fight with big tech.**

**We also demand that LLMs used for educational and vocational training purposes in language, translation and interpreting training be classified as high-risk due to the importance of removing bias, eliminating profiling, avoiding priming and other well-known AI risks.**

## Platform Work

In 2022, over 28 million people were working for digital platforms. This figure is expected to reach 43 million by 2025. Revenues for platforms have grown five-fold in the last 5 years.<sup>3</sup> In the translation and interpreting sector, platforms have huge databases of translators and interpreters but often have very low selection and acceptance criteria. Some translation platforms issue misleading certifications masquerading as professional qualifications, adding to confusion about qualifications in the sector.

Their role as intermediaries causes an information and a power asymmetry, leaving individual translators and interpreters with very low bargaining power. Platforms pit solo self-employed against each other, causing a downward spiral of translation and interpretation fees, to the benefit of the platform, but often not the clients and certainly not the freelancers working for the platforms. This race to the bottom can only result in lower quality.

And yet, as individuals, we have little or no bargaining power when working with platforms. These latter are a growing feature in the translation and interpreting sector, as attested by large-scale and global consolidation of LSPs.

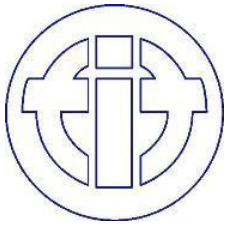
There is little evidence that the new technologies available in the translation and interpreting sector are genuinely enhancing working conditions. The profits from reusing language data generated by translation workers are consolidated in the hands of a few owners. This data is often reused to train machines and then in turn used to lower prices.

By its very nature the European translation market is multinational. Although we welcome the new EU Directive on platform work, there is uncertainty as to what the legal framework will be in the case of cross-border operations and cross-border dispute resolution in platform work.

Another concern is transparency in the algorithmic decision-making processes used by platforms. We call for more transparency in the algorithms and criteria used to recruit, assess and rank contractors, automated quality metrics, etc.

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<sup>3</sup> <https://www.consilium.europa.eu/en/infographics/platform-economy/>



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Note that one of the Commission's proposed criteria of control in relation to non-standard forms of employment or platform work is 'restricted possibility to work for a third party' which seems to oddly echo its ban on freelancers working for more than one EU institution at a time and indeed the ban on freelancers taking part in more than one tender. This state of affairs raises concerns of how EU institutions ensure 'fair work' practices for work carried out on their behalf through the intermediary of LSPs.

**We demand fair work and fair pay for all platform workers. We also demand the EU help us achieve greater power symmetry in these relationships.**

## **Collective Bargaining and Agreements**

In 2022 the European Commission adopted guidelines on collective agreements regarding the working conditions of solo self-employed, which allow translators and interpreters to come together and negotiate collectively better working conditions without breaching EU competition rules. A first landmark collective agreement was signed by Finland's audiovisual translators in April 2023. We welcome the clarification made in these guidelines that competition authorities will not treat agreements collectively bargained by the solo self-employed as breaching competition rules.

It is to be hoped that the Guidelines on collective agreements for solo self-employed adopted by the EU Commission will help alleviate the current situation for translation and interpreting professionals. However, there are still many unclear points, considering our weak negotiating position, and we hope you can help us in making EU institutions and Member States aware of the uncertainty we face.

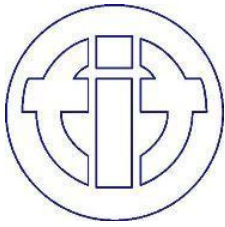
Since the guidelines will be transposed and enforced differently by Member States, **we are calling for a minimum common basis**, i.e. minimum working conditions for solo self-employed to ensure fees are adjusted to the rate of inflation, fees are negotiated fairly and cannot be changed unilaterally, invoices are paid in line with the Late Payment Directive, etc. and for specific recognition of and requirement for translation and/or interpretation qualifications in all professional translation and interpreting work. The Late Payment Directive, now under revision, has reduced delays, yet 60% of businesses in the EU are not paid on time, and SMEs and freelancers are bearing the brunt.<sup>4</sup>

In light of the Commission's guidelines on the solo self-employed, we ask can professional associations recommend rates? Associations must be allowed to play a role in ensuring decent working conditions for solo self-employed by helping them negotiate rates with clients. They also have a role to play in upholding translation and interpreting quality through their professional examinations and membership acceptance procedures.

**We would like clarification in particular on how worker groups such as professional translation and interpreting associations can represent their members in collective bargaining processes, and in particular the role professional associations can play in ensuring fair compensation and fair work**

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<sup>4</sup> [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13665-Late-payments-update-of-EU-rules\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13665-Late-payments-update-of-EU-rules_en)



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**practices for all participants throughout the translation and interpreting value chain. We call on the EU to actively regulate compliance.**

**We call for professional associations to be given greater powers in negotiating rates.**

## Fair Work

As discussed above, there has been a general decline in the financial position of translators and interpreters (ELIS 2024 survey).

We believe that all workers, whether employed or self-employed, are entitled to fair work, which means being able to work under fair conditions, with fair contracts, earn a decent income, be paid on time, have bargaining power and much more. In January 2023 a report from the Commission to the Council on access to social protection for workers and self-employed showed that in 2021 there were 18.4 million solo self-employed, out of which 15.3 million did not have access to unemployment benefits. The report also showed that most Member States are not aiming at closing all existing gaps in access to social protection.

Most translation and interpreting professionals are sole traders or solo self-employed. Under EU law, rather than simply being classified as workers, we are considered ‘undertakings’, placing us on a par with SMEs and even with large multinational corporations, underscoring the economic and power asymmetry at play in the sector.

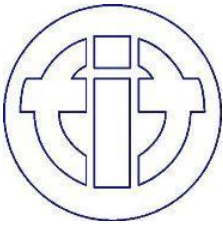
We therefore miss out on important labour and social protection rights, a situation that the platform work directive and the guidelines on collective agreements will hopefully go some way to addressing, but we feel that ensuring these key rights needs more comprehensive attention. Research confirms that the boundaries between self-employment and employment are blurring, with some self-employed workers finding themselves in a situation akin to employment. Economically dependent self-employed people are less likely to have autonomy over how and when they do their job and are often in a similar situation to employees. This group of workers is least likely to receive training on the job, least likely to consider that their job offered good career prospects and most likely to experience poor job quality.<sup>5</sup>

**We demand that the EU ensure that self-employed translators and interpreters have the right, among other things, to work under just and favourable conditions, to fair work and recruitment practices, to fair compensation for high-skilled work, and to a properly functioning social safety net that includes them in unemployment, sickness, disability and pension entitlements.**

Multilingualism and linguistic diversity are fundamental principles of the EU. Translators and interpreters have always played a crucial role in Europe. There have been numerous initiatives at EU and Member State level to promote and support self-employment, yet the self-employed face a market in which they not only have to compete with humans, but also with new technologies, pushed by large corporations who are making huge profits on the back of our work without fair compensation. **We do not reject new technologies, we embrace them.** We have always used technology to improve and make our work processes more efficient,

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<sup>5</sup> <https://www.eurofound.europa.eu/en/publications/2024/self-employment-eu-job-quality-and-developments-social-protection#:~:text=Key%20findings,from%2015.4%25%20to%2013.7%25>



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but we are convinced that a human-centred approach should put technologies at the service of humans, not the other way around.

Large LSPs are making huge profits on our work, even more so with AI, reducing our fees more and more and claiming AI can replace us. We believe that humans are the ones who add value to whatever AI does, but the profit-oriented setup tends to marginalise humans and claim everything can be automated. Our work is the result of great creativity and experience, of years of university education in translation and/or interpreting, of years of continuous professional development and hard graft. The yardstick cannot be the minimum wage, which applies to unskilled labour, but yet this is increasingly what is on offer.

We hope to initiate a fairer dialogue, at both Member State and EU level, that takes into account our demands as humans and workers, includes translators and interpreters in the decisions and debates affecting the sector, and places us at the heart of its translation and interpreting policy.

*The FIT Europe Advocacy Working Group*