

Translating Hazard Communications

A Buyer's Guide



Why Quality Matters

We could list all the reasons why we believe Environmental, Health, and Safety (EHS) plays a vital role in society (managing waste, preserving the environment, maintaining safe workplaces, etc.). In our opinion, this is reason enough to explain why extra effort is a necessity when dealing with the translation of hazardous communication. However, there is another very important consideration for hazard communications: the enforcement regimes of the nations in which your products/substances are manufactured, imported, and/or distributed.

For example, according to research sponsored by the European Commission, the Competent Authorities of the EU member states have varied but have well-defined regimes of enforcement. Administrative penalties for noncompliance with the requirements of REACH (Registration, Evaluation, Authorization, and Restriction of Chemicals) can run from €50,000 to €1,000,000, or may result in a suspended business license, a ban on the use of the substance in question, and the closure of operating premises. Criminal penalties for individuals can run as high as €55,000,000 or up to 5 years' imprisonment.*

Safety Data Sheets (SDS), being the “main instrument of communication in the supply chain”, are one of the first items that are inspected for compliance. Sweden, for instance, criminally penalizes “negligence” when core provisions of REACH, such as the requirement to provide an accurate SDS, are violated.*

With this in mind, would you feel confident knowing your SDSs and labels were translated using a free online translation engine? Or if they were translated by a translator who has never even heard of the Globally Harmonized System (GHS)? We recognize the criticality of accurate hazard communication translation, which is why we put together this short guide. This guide highlights some of the issues we've come across in our (20+) years of experience serving chemical companies, manufacturers, consultants, and SDS authoring platforms. We hope it will give you food for thought and support your decision-making process with the insight provided.

* “Report on the penalties applicable for infringement of the provisions of the REACH Regulation”, prepared by Milieu Environmental Law & Policy for Chemicals Unit, ENV.D.1, Directorate General Environment, European Commission (March 2010).

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Generalists vs. Specialists

“If you think it’s expensive to hire a professional to do the job, wait until you hire an amateur.”

-Red Adair

In the world of language services, specialization isn’t the norm. Due to the lack of a barrier-to-entry in the field, almost anyone can claim the title “linguist” or launch a translation company. The U.S. has no official certification process established for linguists. Existing examinations, such as those provided by the American Translators Association, are beneficial for determining whether a linguist is generally competent in a given language. However, such exams do not test for technical ability within a specific field or domain, nor are critical research skills tested as part of this qualification process. The vast majority of translation companies advertise that their translations are done by native-speaking linguists with advanced degrees in the relevant field. That does not mean the individual is qualified or experienced enough to do the work correctly.

Therefore, linguist qualification is a key role in a Language Service Company (LSC). In particular, an excellent LSC will:

- Concentrate its efforts within the fields and industries aligned with its experience, knowledge, and resources;
- Define the credentials and background of ideal linguists and determine a process for finding and recruiting them; and
- Implement a suitable method of evaluating candidates’ linguistic, technical, and research skills; and
- Continually monitor performance over time.

This may come across as common sense. However, not all vendors have the same approach or standards.

What to look for:

When evaluating an LSC, it is important to ask the right questions, such as the ones listed below.

1. How do they recruit and evaluate their talent?
2. Can they provide specific information on the background and qualifications of the linguist(s) who will be working on your translation?
3. Are they going to use the least expensive translator they can find?
4. Will your translations be “Crowd-Sourced” or “Cloud-Sourced”?
5. Will your translations be done by a Machine Translation (MT) tool, such as Google Translate?
6. How is performance monitored?

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The Unique Needs of Hazard Communicators

Hazard communication draws in part from both science and law. Regulatory authorities define the criteria for classifying and communicating chemical hazards. Hazard communicators must be competent in chemistry, biology, and toxicology, and possess an understanding of the content of the regulations, such as the REACH/CLP legislation in Europe and China's GB standards.

Linguists dealing with hazard communication must have these skills in addition to outstanding language abilities. They must know the content of the national regulations of both the source and target languages, as well as how they correspond to each other.

They must be able to distinguish the specific uses of terms such as "class" and "category", "substance", "mixture" and "article", "irritant" and "sensitizer" as they are utilized in technical regulations. Translators unfamiliar with the field are unlikely to grasp how these terms are being used in hazard communication. This is especially true when dealing with individual phrases translated outside the context of a complete document, such as custom SDS phrases loaded into your authoring system from an Excel file.

This is also true for translators familiar with the regulations who lack the scientific training to fully understand technical terminology. A competent linguist with the right scientific background should be able to identify potential technical errors and bring them to the attention of their client, for instance, when a given value does not seem to be appropriate for the physical property to which it refers.

The LSC serves as the interface between the client and the linguist. The LSC is also responsible for the overall quality, completeness, and accuracy of the translation. The LSC must understand the subject domain at a deeper level.

For consideration:

1. Does your LSC ask questions about context?
2. Do they seek to clarify how terms are being used?
3. Are they actively aware of the hazard communication regulations currently in force?
4. Do they request clarification when regulations offer conflicting or inconsistent translations? If not, are they truly capable of (and dedicated to) producing a translation that is technically accurate and compliant with regulatory requirements?
5. Does your LSC certify their translations? If so, what specifically do they certify?
6. Does your LSC review translations against regulations?
7. Can your LSC specify a regulatory reference for phrases where a reference should exist?
8. Is your LSC a member of any trade organizations in the industry?
9. Does your LSC send staff to technical training within the subject industry?
10. Does your LSC present at trade conferences outside of the language industry?
11. Does your LSC do all EHS-related translations literally, or do they require clarification on when the translation should match the translated regulation text exactly, match the English regulation text exactly, or be a literal translation of the English regulation text?
12. Can your LSC cite differences in EHS regulations by version, country, or within the same regulation?

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Certification

Many LSCs offer free “Certification” of their translations. A typical certification contains a general statement that the translator is a native-speaker, fluent in one or more applicable languages, and that the translation is done to the best of their ability.

In reality, a certification is not a warranty that the work done will be error-free, or even that it is done correctly. All the certification states in most cases, is that the work was done, “to the best of their ability”, and there is no guarantee of quality, accuracy or completeness in most certifications.

For consideration:

- Does your LSC certify the domain-specific knowledge of the linguist?
- Does your LSC certify familiarity with applicable regulations?
- Does your LSC cover all types and domains of translation work with a single certification?
- Will the LSC provide a detailed rationale or regulatory references when questions arise?
- Does the LSC have a process for handling client inquiries when questions arise?
- Will the LSC quickly and correctly fix any errors in their translations or adjust to your preferences?

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How GLTaC Works Differently

We've been working in the health and safety field for nearly two decades. Every day, GLTaC helps a variety of organizations and individuals ensure the accuracy, compliance, and timeliness of the translation of their hazard communications. When you contact us with a request for the translation of a SDS or label, our team knows exactly how to approach the project. This is due to the stringent processes and standards we've developed and our dedication to the idea that lives depend on our translations.

Recruiting and evaluating translators

Due to the aforementioned lack of meaningful technical accreditation for translators, GLTaC partnered with a major SDS authoring platform over fifteen years ago to develop a testing process for translators of hazard communication. We enhanced this evaluation process so we can quickly and accurately assess the skills a translator in this field needs: regulatory knowledge, technical understanding, and research abilities.

Maintaining current regulatory references

We monitor and maintain records on hazcom regulations around the world, so we are aware of the specific requirements in each country. Need an SDS translated for use in Mexico? We conform to the terminology provided in the current version of Mexico's GHS implementation. Exporting a product to Malaysia? Our translators are ready with the Industry Code of Practice from the Department of Occupational Health and Safety (in Bahasa Malay).

Communication, questions, and review

Because our translators have expertise in hazcom, it is not uncommon for GLTaC to ask our clients questions in order to confirm, clarify, or correct errors translators come across within the source documents. For this reason, our project managers, reviewers, and editors are also trained and knowledgeable in the field, greatly enhancing our ability to communicate intelligently as a team. This results in improved translation quality, which means an improved experience for our clients.

Client feedback

In many cases, our clients support most of the world's largest chemical and petrochemical manufacturers. This means that our work is subjected to intense scrutiny and review on a daily basis. When questions arise, we provide item-by-item substantiation for why a specific term appears in a translation or which regulatory reference supports a particular phrase. Our goal is to strive for six-sigma quality levels, which is unheard of in the translation industry, but given the critical nature of the translations we provide, we believe one error is one too many.

Don't just take our word for it. You can visit our website to request a **free quote** at any time. Give us a try today!