OPEN LETTER



April 11, 2023

Mr. Dominic Laporte CEO, Translation Bureau Public Services and Procurement Canada Place Montcalm, Phase III 8-70 Crémazie Street Gatineau, Québec K1A 0S5

Dear Mr. Laporte

Following the abrupt and surprising meeting of the Translation Bureau Advisory Panel's Procurement Working Group on April 5th, we are writing to express our dismay and sadness about the new contractual provisions to procure the services of freelancers to work in Parliament and other federal government conferences.

We believe the new provisions are extreme and irresponsible and will place freelance interpreters' health at potential risk and could well result in fewer interpreters being willing to work in Parliament.

As you know, since the advent of virtual Parliament at the beginning of the pandemic which coincided with a sharp increase in injury reports among staff, the TB heeded AIIC guidance and limited both staff and freelance interpreters' exposure to harmful compressed and digitally modified sound to protect our hearing through shorter working hours.

The TB now intends to discard this precautionary approach and return to pre-pandemic conditions for interpreters despite a hybrid parliament.

If this proposal becomes official, freelancers will face 6 hours in the booth interpreting meetings most of which will include exposure to compressed audio from remote participants because the new rule treats in-person and hybrid events exactly the same when it comes to staffing and hours of work.

Further, the TB is also proposing to reinstate pre-pandemic morning and afternoon/evening shifts for the Hill but notes that these will only be recognized "to the extent possible" raising the possibility freelancers will have to split assignments on the Hill over a 13.5-hour day.

No meaningful limits to exposure to potentially harmful remote audio are proposed in the TB's proposed new provisions, unlike other institutions worldwide that are taking real measures to limit interpreters' exposure to these hazards.

For example, United Nations teams of two interpreters work three-hour sessions. When airtime occupied by remote speakers hits the 30-minute mark for the team, the meeting chair announces that no further interventions from remote participants will be interpreted for the balance of the session. What the TB has proposed would allow a team of two Canadian freelance interpreters to be exposed to almost four times as much harmful remote audio over a four-hour assignment.

Exposure limits proposed by the TB are all but meaningless because they cap remote audio at an exceedingly high number of minutes and only while a freelancer is interpreting. The same audio from the same remote participant is not counted while an interpreter is actively listening to be ready for their next turn at the mic. At the UN, and in other institutions, remote audio listened to by the entire team is what is counted. The Translation Bureau asserts the rate of participation of remote speakers in Parliamentary committee meetings has declined to 25% to somehow justify this insincere cap. Yet, the TB officials were unable to share this information at the Working Group meeting and made no commitment to disclose it.

Unlike the TB's plan, European and UN organizations are paying even more attention right now to the precautionary principle and are reducing exposure to remote minutes spoken using effective deterrents. Also, they have moved away entirely from using headsets with integrated microphones in order to eliminate another layer of digitally manipulated sound.

In addition, the TB proposal completely disregards cognitive load increase in remote settings and its negative impact on interpreter performance and the quality of service we are able to provide despite the TB itself having commissioned this research.

These contractual provisions further offend the precautionary principle needed to safeguard interpreters' auditory health and the sustainability of the profession in that they will be in place for up to three years.

Of course, the TB continues to be unable to meet the interpretation requirements of Parliament and is under immense pressure from the House administration to deliver. It is also a fact that many MPs want the House administration and the Translation Bureau to work collaboratively with interpreters and our Association to find practical solutions. The PROC made this recommendation just a few months ago. In 2021, the House of Commons unanimously adopted a motion to declare the health and safety of interpreters a priority. This plan has taken us completely by surprise. Collaborative is the last word I would think of to describe it.

I would call it irresponsible. Putting freelancers in harm's way now that so many of your staff are injured, will only lead to injured freelancers and less capacity.

I urge you to withdraw this extreme proposal and stand up for interpreter health and safety and the workplace conditions we need to provide quality service before it further undermines the Translation Bureau's service to Parliament.

Yours sincerely,

linda Ballantyne

Linda Ballantyne President

cc The Hon. Anthony Rota, Speaker, House of Commons Matthew Ball, v.-p. Translation Bureau Justine Bret, Chief Interpreter of Canada Karine Doiron, A/Deputy Director, Official Languages Interpretation