

130820 pc ants

SALPCB 11

Dear Mr. Ajabulile Mtiya

Thank you for the opportunity to comment. I don't expect my comments to have any significant influence on the Bill, as it is unlikely that the intents with the legislation will at this stage be amended to accommodate my views / comments, moreover being from an individual and not an organisation.

I am a member of SATI.

My first response to the Bill was: Oh no, not another law, not another Board to be appointed, administered, and paid, not another form of regulation of activities in South Africa by way of registrations, accreditations (not that I am against accreditation as such), etc. South African Parliament has churned out literally hundreds, if not thousands, of Acts of Parliament during the past almost 20 years – highly sophisticated in many ways, very elaborate, intricate, but unwieldy and unadministrable because of lack of capacity to apply these laws. In this case, another Board and its activities that has to be funded by public money, and it is doubtful if the fees that are levied will ever be really put to effective use, as has been proven by the SAQA and its SETA's. The Bill provides for highly bureaucratic processes and procedures. The country is being regulated to death. This being some general comment which is unlikely to elicit any serious response, for this is the way that everything has been approached.

More specifically, I wish to comment on the following:

Regulating the freelance translation profession specifically: The freelance translating industry / profession is one of the professions that is completely self-regulating internationally (maybe with exceptions I am not aware of), except now in South Africa, where it is deemed essential to regulate this. I know, for I have studied international freelance translators' fora on the internet quite carefully, and I haven't come across one single translator that is regulated in any country. What does happen is that translators obtain accreditation, which is not dependent at all on academic qualifications in the language field, but is determined by concrete evidence of a translator's abilities, provided for by testing abilities much the same way as currently happens through the SATI. But whether accredited or not, freelance translation services are offered on a completely open market. The reason is that language qualifications are by no means adequate proof that a person is indeed a good translator, especially while young and inexperienced. Internationally inherent and acquired ability comes into play in demand and supply for services, with accredited, experienced and able translators, especially if also specialised in certain fields, enjoying the cutting edge when it comes to work offers. The question is: Why is it necessary in South Africa, except for being employed in the public sector and formal institutions? Is it because of the 11 official languages and the fear that the standards will not be met? My plea is that freelance translation should be encouraged in SA, and accreditation, as now, be done through a body like SATI, without the necessity to register.

I trust that someone will heed this comment and realise that maybe there is some sense in it.

Kind regards

Theo Stehle

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