

130820 pc ant
SALPCB 14

Dear Ms Mtyia

I would like to submit the following:

There are many voluntary associations of professional language practitioners which were not consulted and that could have made a valuable contribution to the inception of the Bill. Examples are LAMP and PEG.

The definition of 'language practitioner' is very widely worded and 'editor' and 'proofreader' are not defined.

The membership of the Council weighs heavily in the favour of government departments, whereas there are many professional bodies that deserve representation as they have experience in these matters.

The functions of the Council are described in too broad terms, which could lead to arbitrary decisions.

The reference to experience is unclear. For example I have 24 years' editing and proofreading experience and approximately 14 years' teaching experience. I have a BA degree with English and Afrikaans-Nederlands as majors, a BCom(Law) degree and an LLB degree as well as a higher teacher's diploma. I edit legal and academic texts and also education-related books. I am not sure whether this will be regarded as sufficient for the Council on a reading of the Bill.

Regarding section 19, I would like to mention that there are existing codes of conduct which are enforced by the professional organisations which were not consulted. However, I have no objection whatsoever regarding a code of conduct set by the proposed Council.

A further concern is enforcement of the provisions relating to suspension or removal from the register. There are unqualified persons who claim to be editors and proofreaders and their services are often used by clients (mainly businesses and students, as publishers use qualified editors) to save on fees.

I would like to end with the comment that I have no objection to a Council but would like to see some refinement before it is enacted.

Yours faithfully

Rae Dalton