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Samuel Williams

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Orientador: Professor José Domingues de Almeida

Internship report Relatório de estágio

Samuel Joseph Williams

Report of the professional internship, a component of the European Master's in Translation programme, completed at *Ad Verbum*, Lisbon, under the guidance of Professor José Domingues de Almeida.

Relatório do estágio profissional, um dos componentes do programa do Mestrado europeu em Tradução, realizado na *Ad Verbum*, Lisboa, sob orientação do Professor José Domingues de Almeida.

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Translation is a journey over a sea from one shore to another. Sometimes I think of myself as a smuggler: I cross the frontier of language with my booty of words, ideas, images and metaphors.

Amara Lakhous

I. ABSTRACT

This Internship Report aims to describe the experiences acquired during a three-month internship at a translation agency. The first part of the report takes an in-depth look at the internship itself. The second part looks at the theoretical approach to translation, where different translation theories are analysed in order to determine the “best” strategy for translating technical documents. The third part of the report takes a practical approach to translation. In this section, five translations with different technical subject matters are analysed. Each translation has been chosen in order to highlight the differing nature of translations completed throughout the internship, but also to show examples of translation problems encountered and how those problems were resolved. The report ends with a conclusion in relation to translation strategies and the future of the professional translator.

Keywords: translation, translation theory, technical translation, professional internship

RESUMO

O presente Relatório de Estágio tem como objetivo descrever de forma concisa as experiências adquiridas durante um estágio profissional numa agência de tradução. Na primeira parte do relatório há uma análise detalhada do estágio. A seguir, há uma abordagem teórica da tradução em que se encontram analisadas as diferentes estratégias tradutivas para determinar qual é a melhor na reprodução de textos técnicos para outras línguas. Logo, na terceira parte do relatório há uma abordagem prática em que cinco traduções, escolhidas tanto pela natureza dos conteúdos quanto pelos percalços de tradução apresentados são analisadas para mostrar como se resolvem tais obstáculos. O relatório termina com as conclusões tiradas relativamente às estratégias de tradução e ao futuro do tradutor profissional.

Palavras-chave: tradução, teoria de tradução, tradução técnica, estágio profissional

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1. INTRODUCTION

This document represents the report of the three-month internship completed in a translation agency, one of the key components of the prestigious European Master's in Translation (EMT) programme studied at the Universidade do Porto, Portugal. The EMT promotes quality translator training at university level and aims to: foster and encourage learning of advanced translation skills; acknowledge, recognise and respond to changes in translation in accordance with technological and market developments; and collaborate with professional associations, institutions and translation companies in order to maintain a thorough understanding of the many facets of the translation profession (European Commission 2012: 1-2). The EMT also hopes to promote the credibility of the profession in the eyes of non-language professionals, applying certain norms and regulations in the hope that translators will one day be granted worth within the marketplace and attributed the respect and financial compensation they deserve.

The internship took place in the 'fourth' semester of the aforementioned course, with the objective of easing the transition between translating at university level to translating at a professional level for real clients, whilst employing the skills and competences learned in the previous three semesters. This report aims to give a general idea of the work completed over the course of the internship, demonstrating real translation problems and illustrating how, using translation strategies learned at university, those problems were resolved.

The report is split into three main sections. The first analyses the internship itself, including how the placement was found, working conditions and practices, as well as an internship timetable.

The second section will be a theoretical approach to translation, looking at: the problematisation of translation, different approaches to be taken when translating documents (including Christiane Nord's "Looping Model" theory), outside factors which can influence a translation, as well as the importance of the translator and how the role has evolved over time. This section will also analyse the pros and cons of individual translation strategies and their applicability in real-life contexts.

The third section of the report will take a more practical approach to translation. A brief introduction will be followed by a detailed analysis of all five translations and the strategies taken to overcome the translation problems they posed. These individual translation projects, in the areas of: legislation, history, science and technology,

academia and economics, highlight the wide variety of themes and diverse nature of projects completed.

Conclusions will then be drawn about the value of the internship and EMT programme, including suggestions on how it could be improved, as well as considering questions about the future of the professional human translator.

Throughout the course of this report, there are many terms which appear frequently. Therefore, in order to try and avoid needless repetition, the following acronyms have been used:

EMT	European Master's in Translation
SA	Source Audience
TA	Target Audience
SC	Source Culture
TC	Target Culture
SL	Source Language
TL	Target Language
ST	Source Text
TT	Target Text

Three copies of this Internship Report have been made available for members of the jury during the *defesa*. After any suggested alterations have been applied, a final copy will be printed as well as a copy on CD, which will both be archived in the library at the Faculdade de Letras da Universidade do Porto.

2. INTERNSHIP

Given the current economic climate, most translation agencies nowadays ask that any contributors have several years of professional experience. Therefore, when presented with the option of completing a research project in the field of translation or a professional internship in a translation agency, the latter seemed as though it would be the most beneficial for a future, long-term career in the translation industry. After a rather long and tiresome process of applying to different translation agencies both in Portugal and abroad, receiving many rejections (due, in part, to lack of professional experience), or simply no response at all, three offers were eventually received by different agencies around mid-January 2014.

The first offer, based in Dublin, initially seemed like a good opportunity to gain experience in both translation and interpretation, using skills learned from subjects studied in the third semester. However, it turned out that the Irish agency were looking for a trainee to fill a more secretarial role, handling incoming translation requests from clients and arranging for “external” translators to complete translation projects. Considering the overall irrelevance of this particular placement to the Degree Programme, the internship did not seem like the best option. After careful consideration, the offer was quickly rejected.

The second internship offer was for a company specialising in pharmaceutical translations based in Barcelona. Though this internship initially appeared more appropriate and relevant than the one for the agency based in Dublin – largely due to the chance of acquiring further experience in a technical, and arguably more lucrative, area of translation – the internship was actually in the field of “project management”. Although the two areas are related, there were some concerns that no actual translation projects would be completed, just overseen. After much deliberation, this offer was ultimately rejected.

The final offer received was from a translation agency based in Lisbon. Though the internship would be unpaid, it would provide the essential professional experience needed to start a career in the translation industry. Moreover, the lower living and relocation costs in comparison to the other two cities also meant that the internship in Lisbon would be the best option financially. The offer was subsequently accepted and the internship started relatively soon thereafter.

The internship at *Ad Verbum – Serviços de Tradução e Interpretação* – a relatively small translation agency nestled in the heart of Lisbon’s business district – ran for three months, between 17 February and 16 May 2014. The agreed working day was from 10am to 6pm, Monday to Friday, although working hours were rather flexible and dependant on work load (please see internship timetable). Excluding bank holidays and meetings with the Personal Tutor at the Faculdade de Letras of the Universidade do Porto (FLUP), a total number of 480 working hours were completed.

Since 1990, *Ad Verbum*’s mission has been to break down language barriers in order to open the “windows of opportunity” for their clients. With three full-time professional and incredibly friendly members of staff, *Ad Verbum* completes translations in a variety of different areas, catering to the needs of their clients. Translation projects involving Western European languages, such as Portuguese, English, French, German, Spanish and Italian, are more often than not translated “in-house”. Projects involving more ‘exotic’ languages, for example, Scandinavian, Asian or Eastern-European languages, are outsourced to freelance “external” translators.

When a translation request arrives and is accepted, the document is analysed and a price given to the client based on the word count. As the translation agency is relatively small, the other members of the team all act as project managers for specific clients, accepting projects either by phone, e-mail or in person. Once accepted, the document is automatically attributed a file with a specific code where it is saved along with the initial and revised translations. *Ad Verbum* does not work with CAT tools and translation memories. Therefore, when a translation project is accepted, the normal practice is to copy and paste the original text into a new Microsoft Word document and then edit the text within the new document. Once the translation is completed, it is submitted for revision by an “external” reviser, in accordance with “EN 15038 European Quality Standard for Translation”. After the revised version of the document has been returned, it is cleaned of all track changes, converted back to the original document format (if applicable) and then forwarded on to the client.

Overall, the experience of working at *Ad Verbum* has been positive. The translation agency has provided the opportunity to translate documents for real-life clients, revise translations completed by “external” translators and be an integral part of a professional team. Some time was needed, however, to adapt to the working methods used.

During the two-year EMT course, students are trained to complete translations with the aid of CAT tools and translation memories. Returning to translating documents without the assistance of any translation software felt like a regression. This style of translating documents also allowed greater room for errors and cohesive inconsistencies. Moreover, translation projects took a lot longer to complete due to the fact that all unfamiliar terminology had to be looked up in online dictionaries instead of consulting suggestions from translation memories.

Over the course of the internship, more than 79 translations were completed, with the longest being just under 3000 words. Though there was always a relatively calm working atmosphere, the fact that translations more often than not had to be delivered the following day took a while to get accustomed to. On the EMT course at university, students were often given a whole week to complete one translation. However, at *Ad Verbum*, once the translation project was completed and sent off to be revised, it was straight on to the next project.

Concerning the revision of translated documents, *Ad Verbum* sometimes suffered from problems with “external” revisers. When the revised versions of translated documents came back, they occasionally contained spelling mistakes and lacked cohesion – for example, the reviser decided to change a specific term at the beginning of a document but did not change the term throughout. These problems were only noticed as *Ad Verbum* granted access to the final versions of the translated documents for purposes of improving writing style and compiling this report. After the “re-revision” was completed, the client was eventually sent the final TT (please see *Introduction* for a full list of acronyms).

However, to end on a positive note, a great effort was made and much importance placed on integration into the team, and even from the first day of the internship all the team members were very accommodating, friendly and helpful. Also, whenever a document contained particularly challenging terminology or vocabulary – usually an acronym inherently linked to an aspect of Portuguese culture or day-to-day life which it was nigh-on impossible to find a translation for – the team members would be more than willing to explain what the term meant and to help find an adequate solution in the TL.

In conclusion, the internship proved rather challenging but it was also an incredible learning experience. Aside from learning a great deal about a wide variety of different subject matters, from economics to construction, legislation to historical

events, the internship also provided the opportunity to experience translating in a real-life, professional environment, working under certain time constraints to ensure projects were completed on time and to a high standard. Though the EMT programme provides students with the fundamental basics to start a career in the field, a professional internship really helps consolidate that knowledge and helps make a translator appear more attractive to prospective employers and clients.

2. i INTERNSHIP TIMETABLE

Below is an attendance table for the duration of the internship, preceded by a key with explanations of what each colour represents. As previously mentioned, the working day was from 10am to 6pm, Monday to Friday, and a total number of 480 hours were completed. As stipulated in the contract, the translation agency permitted certain days off during the internship for Personal Tutor meetings in order to talk about the progression of the internship and this report. There were also several national holidays during this period, which have been included and highlighted accordingly:

KEY	
	Internship
	Weekend
	Meeting with Personal Tutor
	National holiday

	FEBRUARY	MARCH	APRIL	MAY
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Table 1 – Internship timetable

3. THEORETICAL APPROACH TO TRANSLATION

Before analysing different translations completed during the three-month internship, as well as the obstacles they presented, it is first important to observe theoretical approaches to translation. In this chapter, different theories and strategies are analysed to show their applicability in real-life translation situations as well as the evolution of translation theory over recent years. However, it is important to first define the concept of translation before different theoretical approaches can be studied in greater detail.

Jeremy Munday (2008: 5) suggests that the term ‘translation’ can have several different meanings. On one hand, it represents the final product itself, or rather, a newly translated document written in the TL. On the other hand, the term is also used to describe the process involved in creating the final product, or rather, the various steps taken in order to successfully reproduce the closest natural-sounding equivalent of a SL document in the TL. Roman Jakobson distinguishes three types of translation; intralingual, interlingual and intersemiotic, although only the first two are of relevance for this report and are thus analysed below.

Intralingual translation is the reproduction of a document or verbal communication by other means in the same language (Jakobson 1959: 114). One example of this type of translation is the use of subtitles produced in the same language on television. The art of professional subtitling is governed by certain rules, for example, 37 characters per line, including blank spaces and typographical signs, as well as a maximum of two lines per shot, etc. (Díaz Cintas and Remael 2007: 82-4). This therefore means that communication(s) may have to be reworded in such a fashion so as to conform to these norms whilst still conveying the intended message. Aside from assisting viewers with hearing impairments, intralingual subtitles can also help facilitate the comprehension of communication(s) given by native speakers with strong accents or regional dialects, as well as non-native speakers with a weak command of the TL. For example, Glaswegian speakers are notoriously hard to understand for British audiences, as Azorean speakers are for the continental Portuguese. In these cases, English or Portuguese subtitles allow those who cannot easily understand the intended message to comprehend what is being communicated.

Intralingual translation can also encompass contemporary adaptations of historical texts so they can be understood by modern audiences. The second translation

analysed in this report is a letter written in the Seventeenth Century to the then King of Portugal. The text had to be translated intralingually into contemporary Portuguese so that its message could be understood clearly before being translated *interlingually* into English. See Chapter 6 for the in-depth analysis.

Interlingual translation, on the other hand, is the reproduction of a document or verbal communication by other means from an SL into a TL (Jakobson 1959: 114), arguably the most common form of translation. However, as any trained translator, or indeed *langagier* can tell you, and contrary to what is often perceived by non-language professionals, translating documents or verbal communication from one language to another is not simply a literal or *word-for-word* process, but rather a free or *sense-for-sense* process.

Early translation theory favours the concept of *Natural Equivalence*. This theory, as summarised by Pym (2010: 7), seeks to find a way to transmit a concept into the TL in the most natural-sounding fashion without losing any of the original meaning rather than sticking closely in both style and syntax to the form of the ST. Although no literary translations were carried out during the course of the internship, we will analyse a small segment from the first instalment of the *Twilight* saga to help explain this concept further.

Adored and abhorred alike, the overwhelming success of Stephenie Meyer's *Twilight*, a fictitious novel revolving around the tumultuous love triangle between Bella, Edward the vampire and Jacob the werewolf, impacted a generation arguably as much the Harry Potter series did before it. In this particular scene Edward calls Bella over to eat lunch at his table in the school canteen. First is the scene as originally written by Meyer in American English (2007: 88):

[Edward] laughed. "You look worried."

"No," I said, but, ridiculously, my voice broke. "Surprised, actually ... what brought all this on?"

"I told you – I got tired of trying to stay away from you. So I'm giving up." He was smiling, but his other eyes were serious.

"Giving up?" I repeated in confusion.

"Yes – giving up trying to be good. I'm just going to do what I want, and let the chips fall where they may." His smile faded as he explained, and a hard edge crept into his voice.

In this scene, Edward decides to use a gambling metaphor, “let the chips fall where they may”, to signify that he will carry on spending time with Bella regardless of what the consequences may be; he will take a gamble, or ‘bet his chips’, on her even though he has no idea whether he will win or lose. This metaphor is used to portray the idea of recklessness, contrasting with the character’s somewhat reserved nature. The segment below is how the scene was translated into Brazilian Portuguese by noted translator Ryta Vinagre (Meyer 2008: 76):

[Edward] riu.

– Parece preocupada.

– Não – eu disse mas, ridiculamente, minha voz falhou. – Surpresa, na verdade... Qual é o motive disso tudo”

– Eu lhe disse... Fiquei cansado de tentar ficar longe de você. Então, estou desistindo.

– Ele ainda sorria, mas os olhos ocre eram sérios.

– Desistindo? – repeti, confusa.

– Sim... – desistindo de tentar ser bom. Agora só vou fazer o que eu quiser e deixar os dados rolares. – O sorriso dele diminuiu à medida que ele explicava e um tom sério esgueirou-se por sua voz.

Here, instead of translating the English expression word-for-word, producing what *Sveti Jeronim*, or St Jerome – charged with translating the original Christian Bible into Latin – might call “an absurd translation, cloaking the sense of the original” (Munday 2008: 20), Vinagre opts for a slightly different metaphor - a *natural equivalent*. In this case, the metaphor “vou [...] deixar os dados rolares” creates the same idea of taking a gamble on Bella despite not knowing what the outcome will be. However, it has been adapted for the target audience: the same image has been created but with an expression that exists in Brazilian Portuguese, the TL, shifting focus from loyalty to the ST to the reader, in line with Eugene Nida’s “Dynamic Equivalence Theory” and the science of translation (Munday 2008: 16).

Popular in the 1960s and 1970s, the concept of “Natural Equivalence” was the first real theory to look beyond the words on the page, using what already existed from within each language system to link concepts, ideas and imagery between two differing cultures (Pym 2010: 12). Although he points out that there is a danger of artificially standardised concepts or abstract ideas being *made* to correspond to each other, Pym

argues that “Natural Equivalence” still plays a key role as a foundation concept from which most, if not all, subsequent translation theory has originated (Pym 2010: 12-19).

After the period of “Natural Equivalence”, however, translation theory evolved and started to place a greater emphasis on other factors, relegating the idea of ‘equivalence’ to just one of many translation options and shifting importance from the ST to the TT and its function.

In her essay „Die vollkommene Übersetzung bleibt Utopie“, Jekatherina Lebedewa argues that translators are bridge-builders, bringing different peoples together and establishing connections between cultures, citing the work of Reiss and Vermeer and the “Skopostheorie”. Popularised in the 1980s, this theory focusses on translation as: an action with a *function* or purpose, the recipient or reader of the translated document and the idea of the translator being a “cultural mediator” (Lebedeva 2007) as opposed to a ‘mere’ linguist. As ‘cultural mediator’, a translator must draw upon their own experiences of both the SC and the TC, as well as skills in cross-cultural communication and knowledge of how to overcome language and cultural barriers, in order to produce a translation that *functions* in the TL.

Let us imagine that a translator has been charged with translating “Stinking Bishop” into Portuguese. Though a popular cheese within Britain’s borders, outside the United Kingdom it is relatively unknown. There are several different, and arguably equally valid ways that “Stinking Bishop” could be translated for a Portuguese audience¹;

- A first party of translators could argue that the words “Stinking Bishop” should be maintained in English and highlighted in italics, perhaps followed by a short explanation in brackets or a footnote, arguing that translation should help explain the culture of the original document to the TL audience. However, this translation runs the risk of misunderstanding on the part of the reader or interruption of the natural flow of reading.
- A second body of translators could argue that the most important aspect of translation is to make alien concepts understandable to the TA, therefore substituting “Stinking Bishop” for, “a traditional English cheese” (um queijo inglês tradicional). With such a translation, however, there is the possibility of losing particular descriptive details of the story. “Stinking Bishop” has certain qualities;

¹ Idea of translation possibilities based on concept outlined in Antony Pym’s *Exploring Translation Theories*, New York: Routledge, p. 2.

white colouring, soft and creamy texture and a famed pungent odour, which greatly differ to those, for example, of “Cheddar”; an odourless, pale-yellow, hard cheese also originating from the United Kingdom. Yet the choice to substitute a specific term for a more generic one could result in the loss of subtle and implicit details which help colour the story.

- A third party of translators could argue that a localised term or an equivalent familiar to the TA would be the best option. In this case, “Stinking Bishop” could be substituted for a Portuguese alternative, such as *Queijo da Serra*. However, this type of translation could negatively affect the authenticity, or credibility of the text, as it may appear odd to the reader to find a traditionally Portuguese cheese in the middle of the rolling green hills of Somerset, for example.
- A final body of translators may decide to make life easier for themselves, and if possible, avoid translating the term altogether if it is not essential to the overall plot.

The truth is that each of these options is just as valid, or invalid, as the other. It has long been argued that when reading a translated document, the translator’s presence should not be felt. In other words, a translation is deemed ‘acceptable’ when it is ‘transparent’; reading so fluently that the translator becomes ‘invisible’ and the writer or the meaning of their words is the only thing ‘visible’ to a foreign audience (Venuti 1995: 2) However, “Skopostheorie” challenges this long-held, and arguably misguided, notion. As ‘cultural mediator’, it is the responsibility of the translator to predict how a certain translation will be received by the TA and to make the best decision accordingly. If we take the “Stinking Bishop” example above, whichever of the four translation options is selected reflects a choice made by a translator based upon their personal experiences of the TC. A translator, often unwittingly, manipulates a translation to fall into line with their own preconceived notions and knowledge of a particular culture, rendering it impossible for their presence not to be felt in some shape or form. It could therefore be argued that no two translations of a document or verbal communication could ever produce exactly the same result due to the different interpretations of each translator about: what is acceptable for / expected by the TA, how each language functions within its respective culture, and the function of the TT in the TC.

Although “Skopostheorie” places a greater emphasis on the recipient of the document, as well as the translation’s function with the TC and the individual translator, Reisse and Vermeer’s approach almost completely disregards the role of the ST yet, by

its very nature, ‘translation is simultaneously bound to the source text and to the presuppositions and conditions governing its reception in the target linguistic and cultural system’ (Baker and Saldanha 1998: 224).

In his recent assessment of the quality of translation, focussing more on subtitling but whose ideas can also be applied to other forms of translation, Hansjörg Bittner furthers the idea of “Skopostheorie” insofar as suggesting that cultural factors as well as the individual translator can affect the final translation. However, he also argues that there are four more factors – each awarded their own individual ‘petal’ (one of which being ‘Source Text’) – to which he attributes equal importance in the translation process and which he believes a translator must consider in order to successfully create the TT; the *corona* of his “Translator’s Daffodil” (Bittner 2011: 77). See Figure 1 below.

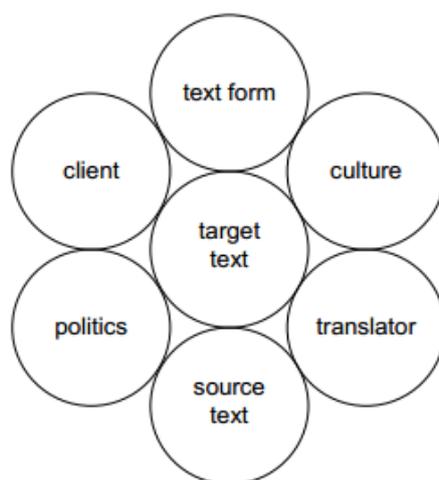


Figure 1: Hansjörg Bittner’s *Translator’s Daffodil*

Bittner raises some interesting ideas by including a ‘politics’ petal – arguably a sub-petal of ‘culture’ – suggesting that political tendencies can also affect the outcome of a translation (government censorship, religious sensitivity, political and cultural prejudices etc.). Bittner also highlights the importance of the client who, at the end of the day, has the final say on the product they are purchasing and whether to accept or reject what has been presented to them.

However, in relation to the many complex questions about whether the text falls into the literary or technical category, the theme and function of the ST and TT and so on, Bittner, we assume, has summarised them all under the umbrella-term ‘Text Form’. As a result, Bittner’s “Translator’s Daffodil”, though quaint in name and somewhat useful, is too vague and overly simplified. It also completely disregards any

consideration for the recipient of the text and how the TA can also have an impact on the way a document is translated – for example, a complex scientific idea which needs to be translated and simplified for a High School textbook. It also makes no attempt to provide any guidance on the actual translation process and essential steps to take in order to successfully create a TT. The “Translator’s Daffodil” could only really be applied successfully by qualified translators who can fill in the blanks with prior knowledge acquired from other theories. For new EMT students with no prior knowledge of translation theory, The “Translator’s Daffodil” *could* serve as a good foundation, but in time this must be substituted for something rather more ‘meatier’ and thorough, like Christians Nord’s “Looping Model”. Nord argues that before any translation can begin, however, a translator must first decide, after consultation with the client, whether the end product (and process) is a “Documentary” or “Instrumental” translation.

Documentary translations allow access to the ideas of the ST but the reader is always aware that what they are reading is a translation. This type of translation includes word-for-word and literal translations, as well as the concept of ‘exoticizing’ translation, where cultural aspects are kept in the ST language in order to maintain the ‘local colour’ of the SC (Nord 2005: 80-81). Instrumental translations, on the other hand, are TT documents where the readers are unaware that they are reading a translation, fulfilling the same function for the TA as the ST does for the SA (Munday 2008: 82). Whichever category the translation project falls into, Nord’s “Looping Model”, Figure 2 below, was devised in the hope of creating a translation model that could be applied for all text types, including technical texts, and in any translation situation:

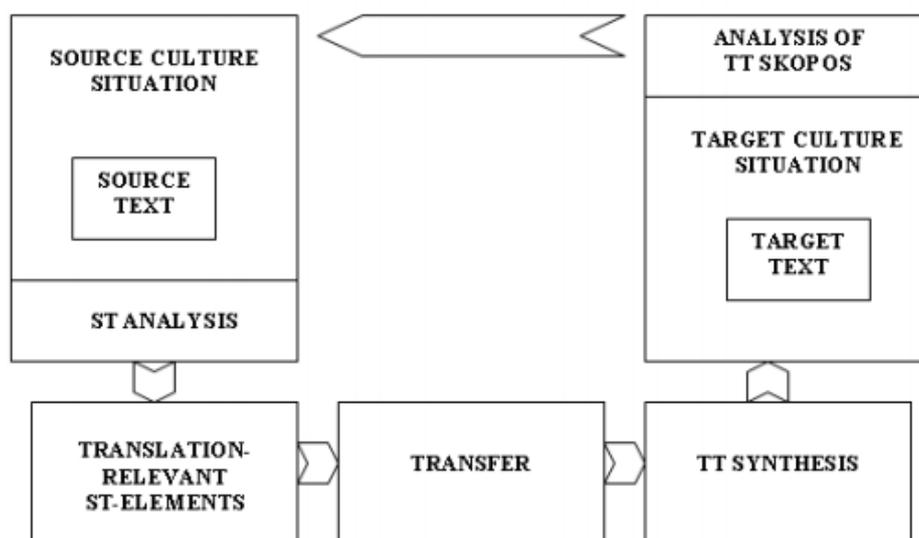


Figure 2 - Christiane Nord's *Looping Model* (Pobocikova 2011: 19)

The above “Looping Model” is based on a functional concept; through the creation of an ST and a TT profile, the function of the ST features can be understood, allowing the appropriate translation strategy to be chosen in order to transfer the document into the TL for its intended purpose (Munday 2008: 82). Analysis of the ST features is also known as “pre-translation” – an aspect of translation which has continued to grow in importance since the days of “Natural Equivalence”.

As part of the EMT course at the University of Porto, many technical translations were completed using Nord’s model in order to train and prepare students for careers in the translation industry. Within the French department in particular, students are required to fill out a *fiche d’analyse* for each translation project. The *fiche*, divided into two sections, covers all necessary aspects of “pre-translation”, corresponding to the “ST analysis” and “Translation-relevant ST elements” sections of Figure 2 above, guiding students to effectively reproduce the ST in the TL with the required function.

Table 6, here translated from Portuguese into English, gives a detailed look at the ST analysis. A brief description of each component is also provided as well as key questions to be asked:

Source Text Analysis (intratextual factors)	
Theme / Area	Subject matter
Content	Cohesion and division of ST (chapters). Will the same divisions be kept in the TT? Microstructure and macrostructure
Presuppositions	Real-world factors (for example, if the target audience is a specialised group – technical terms may need to be used)
Non-verbal Aspects	Any images or figures that may or may not need to be adapted (labelled diagrams)
Lexicon	A list of difficult vocabulary and/or technical terminology in the SL. This list is often translated first to save time later. Any dialectal terms or colloquialisms? Register?
Syntax	Sentence structure and punctuation of the ST. Can this be transferred into the TT?
General comments about overall strategy	The approach to be taken to successfully translate the document. In relation to “team-translations”, information about each individual’s respective role (sections to complete, who performs the revision) should be included here. A general approach may appear like the following: 1) Pre-translation 2) Transferral 3) Cross-referencing and/or revision 4) Saving the document appropriately (and delivery to client)

Table 2 – Source Text analysis

A table like the one above is particularly useful for technical translations as it places greater emphasis on the most important functional properties of the ST and TT, allowing the translator to create an overall strategy for transferring a document from one language into another. As with any plan, the amount of detail depends entirely on the individual as well as on time constraints – a short deadline may mean that a translator does not have as much time to produce an extensive translation strategy, but rather just the ‘bare bones’ of an ST analysis. A table similar to the one above acts as a useful guide during the translation process, tackling the more complicated parts of the translation process first – assuming, of course, that the translator in question possesses adequate knowledge of their working languages. For collaborative translations, ST analysis can help keep cohesion throughout the document, particularly in relation to complex technical terminology.

Table 7 below explores the Translation-relevant ST elements. A brief description of each heading and key questions are also provided:

Translation-Relevant Source Text Elements (extratextual factors)	
Title of Source Text (ST)	Title of the document
Name of file	Translation should always keep the same name as the file, followed by “_EN”, “_FR”, “_PT” etc. depending on the TL
Number of words	Useful if only certain sections of a document need to be translated as well as calculating the price for the translation
Date received	Date the project was commissioned
Source language	Language of Source Text
Target language	Language of Target Text
Deadline	Helps keep the translator on track – a translation delivered late could result in a financial penalty or cancelation
Supporting material	Parallel websites/texts that can be consulted for specific terms
Client	Name of the client (may need to contact client for help with particular terminology in the ST)
Publisher of Text	The publisher of the document to be translated
Author(s)	Name of the author(s) of the ST document (may need to contact author for help with particular terminology)
Function of ST	Purpose of the ST. Why was it created?
Function of Target Text (TT)	Purpose of the TT. Why is it being created?
Text type (ST)	Literary/Technical?
Text type (TT)	Literary/Technical? Documentary/Instrumental?
ST Recipients	ST audience
TT Recipients	TT audience – is it the same as the ST audience?
Time and place ST received	When and where the translation project was received
Objective of ST and TT	Why does the ST exist and why is it being translated?

Table 3 – Translation-relevant Source Text elements

The Translation-relevant ST elements table places a specific focus on the details of the addressees and the function of both the ST and the TT, provides practical information such as the name of the client (for documentation purposes as it may not be the first time translating for a particular client), and notes the deadline by which the project has to be delivered. Though most translators are keen to get stuck into a translation project the moment it arrives, taking some time to complete the “pre-translation” process allows a translator to thoroughly understand the function of the ST within the SC and the objective and function of that same text in the TL for the TA.

After the “pre-translation” stage, the document can then be transferred into the TL following the strategy in the “General comments about overall strategy” section of the ST analysis table. Once completed, the “post-translation” stage can begin.

The European Commission’s “EN 15038 European Quality Standard for Translation” aims to establish requirements for the provision of high-quality translation services, with the objective of ensuring that the translation industry is on a level playing field with other professional industries (EUATC). Amongst other characteristics, one of the main clauses of the EN15038 Standard dictates that a translation must always be revised by a colleague or external reviser before it is delivered to the client. Revising a document involves comparing and contrasting the ST with the newly-produced TT. Firstly, this ensures that the content of the ST has been accurately transferred into the TL. Secondly, revising the TT ensures that there is both lexical and syntactical cohesion throughout the translated document, particularly in the case of “team-translations”, and verifies that the function of the TT adequately matches the client’s request, regardless of whether it differs from the function of the ST. If the reviser believes that entire sections of a TT need re-translating, either due to mistranslation of complex terminology or the required function of the TT, then a translator would often have to re-translate the ‘offending’ sections. These sections would then have to be re-revised to make sure they comply with the client’s specifications, as well as the current linguistic and cultural norms.

Nord’s “Looping Model” has more or less become the standard translation model applied by translators and in universities where the EMT is taught. At a university level, where students sometimes have a whole week, month or even semester to translate a document and critically analyse the translation they are producing, Nord’s model is indeed an incredibly useful tool. Essentially, the “Looping Model” is a highly-developed plan that aims to tackle the complex obstacles presented by the ST first,

facilitating the transferral process into the TL later on. However, from personal experience of working in a translation agency for three months and completing translation projects for real clients in a variety of different technical areas – comprehensively listed in *Annex III – Comprehensive list of Translations Completed*, of the appendices – Nord’s “Looping Model”, with its emphasis on ST analysis and “pre-translation”, is not *always* viable. When a relatively large project arrives with an extremely short deadline, it is not practical to complete such an extensive ST analysis as the TT would never be completed on time. Nevertheless, some of Nord’s translation ideas, for example, placing focus on the function of the text and the TA, *can* be applied on a daily basis and serve a translator well when attempting to produce a translation product of high quality in the TL.

In the next section of this report, we take a more practical approach to translation. Real translations completed throughout the course of the three-month internship are analysed in greater detail to look at the obstacles they presented and the strategies used to overcome them. Each translation selected is thematically different from the last. This is to show the varying nature and the broadness of the technical areas covered during the three months.

4. PRACTICAL APPROACH TO TRANSLATION

In the previous chapter, a more theoretical approach to translation was discussed, giving a greater sense of the various methods, models and theories of translation, from “Natural Equivalence” to “Skopostheorie”, Hansjörg Bittner’s “Translator’s Daffodil” to Christiane Nord’s “Looping Model”. In this section of the report, we analyse how these theories were applied during the course of the internship to tackle the various translation obstacles presented by certain specific projects.

As previously mentioned in this report, the texts translated during the three-month internship were in a great number of different subject matters. As a result, each one could be classified as a “technical text” due to the difficulties each one presented, either in the area of terminology and lexicography, specific functions, syntax or, as was the case with the majority of ST written in European Portuguese, register, requiring the use of different translation strategies to achieve the desired solutions.

Even though it is considered rather ill-advised to complete translations without the use of Translation Memories and CAT tools, these were simply not available during the internship at *Ad Verbum*. This therefore meant that a lot more research had to be conducted using online dictionaries, technical glossaries, parallel texts and translation forums (PROZ etc.) with the objective of finding the correct, or most adequate, translation equivalents. This research led to an increased knowledge in a wide variety of different technical areas – something which would later prove useful for future translation projects.

As stated beforehand, each translation analysed in this section of the report was chosen for its specific technical subject matter. It was also decided to choose translations projects where many errors were made, but ones from which the most was learned. Though it would have been easy to select certain translation projects with few alterations (of which there were quite a few), this would have promoted a false image of near perfection translation practices, in detriment to the hard work, research and long hours put in during the course of the internship, as well as the learning curve that took place.

Table 8 below shows the translations analysed in greater detail, first starting with the sequential order, followed by the name of the document (which may be different from the title of the original as it appears in its respective table in *Annex III – Comprehensive list of Translations Completed*, of the appendices), and the number or

words of the ST. The texts have also been categorised according to their subject matter in order to show the wide variety of texts translated over the course of the three-month internship.

Translation No.	Name of Document	No. of Words	Thematic area
1	Decree-Law No. 207/2005 of 29 November	2952	Law
2	Letter from the Viceroy of India to the King	454	History
3	Specifications for robots - deactivating explosives	1401	Science and Technology
4	Degree supplement and transcript – Ukraine	701	Academia
5	Grant Thornton – Statutory Auditor’s Report	800	Economics

Table 4 - Technical translations analysed in this report

All of the texts above are divided into separate chapters. For each chapter, there is an information key, summarising the problems faced in the respective translations, as well as a brief introduction about the document itself. The full documents for each of the above translations can be found in the appendices. Only certain extracts will be analysed, and where possible, presented in tables consisting of three columns. The first column contains the original document in Portuguese, the second, the initial translation in English, and the third, the revised translation (if available).

As guidance for the reader, the translation problems or difficulties analysed are highlighted in accordance with the key below:

KEY	
	Content rephrased by reviser
	Content added by reviser
	Translation errors

In order to protect the identity and privacy of either the authors or subjects of the documents above, any private personal information, company names, identification numbers, addresses and telephone numbers have been substituted for “XXXXXX”, except for documents in public domain.

5. TRANSLATION 1: Decree-Law No. 207/2005 of 29 November

<u>Key information</u>	
Document type:	Legislation
Area:	Law: Roadway video surveillance; objectives, procedure, registration
Word count:	2952
ST Language:	Portuguese
TT Language:	English
Main obstacle(s):	Legal writing style, unfamiliarity with subject matter

Decree-Law No. 207/2005 of 29 November, in public domain and available online, communicates the protocol for the installation, registration and use of video surveillance on Portuguese roads, including regulation about what is permitted to be recorded, the scope of the geographical area to be recorded, use of any registered materials by the police and intercommunication between surveillance centres and legal authorities. As the document is rather extensive, only certain extracts will be used. The full document, the initial and revised translations can be found in the appendices.

One of the main challenges encountered when translating this document was the legal writing style. Very few legislative translations were completed during the course of the EMT programme, which therefore meant that the terminology and specific writing style necessary for documents of this nature were relatively unfamiliar. The main strategy to overcome this translation obstacle was the use of parallel texts; similar legislative documents written in English from which inspiration could be drawn. As the deadline for this project was relatively short, there was not enough time to complete a full and thorough ST analysis. Despite the parallel resources used, an inappropriate “plain” writing style, employed with the intention of producing documents that can be understood by both professionals and non-professionals alike, was used instead of the appropriate “Legal English” writing style. An example of this problem, later resolved by the “external reviser”, is line 12. “No uso da autorização legislativa concedida pelo n.º 2 do artigo 23 da Lei n.º 39-A/2005, de 29 de Julho” was initially translated as: “In the exercise of legislative power under article 23 (2) of Law No. 39-A/2005 of 29 July”. However, the reviser rephrased this sentence, opting instead for “In *exercising the* legislative power *granted by* article 23 (2) of Law [...]”:

Line	Original (PT)	Initial Translation (EN)	Revision (EN)
12	Assim: No uso da autorização legislativa concedida pelo n.º 2 do artigo 23.º da Lei n.º 39-A/2005, de 29 de julho, e nos termos da alínea b) do n.º 1 do artigo 198.º da Constituição, o Governo decreta o seguinte:	Therefore: In the exercise of legislative power under article 23 (2) of Law No. 39-A/2005 of 29 July, and in accordance with paragraph b) of article 198 (1) of the Portuguese Constitution, the Government decrees the following:	Therefore: In exercising the legislative power granted by article 23 (2) of Law No. 39-A/2005 of 29 July, and in accordance with paragraph b) of article 198 (1) of the Portuguese Constitution, the Government decrees the following:

Though the message in both the initial and revised translations is similar, the initial translation was arguably influenced by the writing style of the ST, going against most modern translation theories, including Reisse and Vermeer’s “Skopostheorie”, which stresses the importance of placing greater emphasis on the function of the TT in the TC and how the TT reads for the TA, as mentioned in *Chapter 3: Theoretical Approach to Translation*.

Another example of where the writing style used in the initial translation was inadequate was with the expression “a redacção decorrente da Lei”:

14	O presente decreto-lei visa regular o regime especial autorizado pelo artigo 13.º da Lei n.º 1/2005, de 10 de janeiro, na redacção decorrente da Lei n.º 39-A/2005, de 29 de julho, definindo:	The present Decree-Law aims to regulate the special regime authorised under article 13 of Law No. 1/2005 of 10 January, amended under Law No. 39-A/2005 of 29 July, defining:	This Decree-Law aims to regulate the special regime authorised under article 13 of Law No. 1/2005 of 10 January, as amended by Law No. 39-A/2005 of 29 July, defining:
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26	1 – Nos termos do regime especial previsto no artigo 13.º da lei n.º 1/2005, de 10 de janeiro, com a redacção decorrente da lei n.º 39-A/2005, de 29 de Julho, as forças de segurança instalam os meios de vigilância electrónica necessários para [...]	1 — In accordance with the special regime under article 13 of Law No. 39-A/2005 of 10 January, amended under Law No. 39-A/2005 of 29 July, security forces are permitted to install electronic surveillance equipment necessary for [...]	1 — In accordance with the special regime under article 13 of Law No. 39-A/2005 of 10 January, as amended by Law No. 39-A/2005 of 29 July, security forces are permitted to install the electronic surveillance equipment necessary for [...]
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The initial translation suggested “amended under Law”, yet the reviser decided to alter the sentence in accordance with the norms of “Legal English”, substituting it for “as amended by Law”. As with the first example, the meaning of both translations is similar, but the latter is what the TA is accustomed to

reading, and is therefore the more adequate translation in this context. Although translation errors are in large part due to the lack of knowledge or experience of the translator, in this case the short deadline and lack of Translation Memories should also be taken into account. *Ad Verbum* has been providing translations in a number of different technical fields since 1990. In this respect, a Translation Memory with pre-registered legal terminology would have facilitated the process of translating the ST, resulting in fewer errors being made in relation to both terminology and writing style.

Other problems which arose during the course of the translation process include the omission of what was deemed to be “irrelevant” information, but which the reviser later considered to be important. This could also be linked to “writing style” as the problem essentially boils down to a lack of familiarity with translating legislative texts as well as a lack of knowledge about relevant information to be included, and irrelevant information which can be omitted, for documents of this nature.

The first clause of Chapter II, article 15, beginning on Line 88, concerns the registration and conservation of recorded data:

88	1 — Os dados gravados e os elementos probatórios acompanham os respectivos autos e processos e são conservados, nos termos do número seguinte, durante o período estritamente necessário para o fim a que se destinam.	1 — Recorded data and documentary evidence should be produced for the respective notifications and processes. They are only conserved for their intended purpose in accordance with the following provision.	1 — Recorded data and documentary evidence are attached to the respective notifications and processes and, according to the following provision, shall be conserved during the strictly necessary period for their intended purpose.
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The original Portuguese text states that recorded data and documentary evidence attached to notifications and processes “são conservados, nos termos do número seguinte, durante o período estritamente necessário para o fim a que se destinam”. In the initial translation, this sentence was divided into two smaller sentences; “[The data and evidence] are only conserved for their intended purpose in accordance with the following provision.” However, the reviser opted to maintain the structure (as one long sentence), reformulate the text and add the information which had been “omitted” in the initial translation: “[...] and, according to the following provision, shall be conserved during the strictly necessary period for their intended purpose”.

The second clause of Chapter IV, article 20, concerning cooperation between legal authorities and surveillance centre workers, the reviser once again includes information “omitted” from the initial translation:

107	2 – Quando, para arquivamento de registos legalmente autorizados, utilizem suportes físicos cedidos pelas empresas titulares dos sistemas de vigilância eletrónica, as forças de segurança pagam os montantes correspondentes ao respectivo custo, nos termos e em condições resultantes de acordo com as empresas.	2 — Concerning the legally authorised filing of records, security forces will agree a sum to be paid to the owners of the electronic surveillance systems for any hard copies produced.	2 — Concerning the filing of legally authorised records, security forces will agree to pay an amount corresponding to the respective cost to the owners of the electronic surveillance systems for any hard copies produced.
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Though the initial translation transmitted a similar message, the reviser used a more formal register and decided to stick more closely to the structure of the ST: “security forces will agree to pay an amount corresponding to the respective cost to the owners [...]”.

There were also problems relating to mistranslations of the ST – either due to the complex nature of the content or the convoluted writing style. This therefore meant that corrections had to be made by the reviser, proving why the “post-translation” stage is as important as both the ST analysis and transferral stages. In keeping with Nord’s “Looping Model” theory, it probably would have been prudent to complete a greater ST analysis for this project, due to the fact that the subject matter was so unfamiliar, but time constraints did not allow for such extensive analysis, as is so often the case.

39	3 – Os dados obtidos através dos equipamentos de vigilância, em tempo real ou em diferido, podem ser usados, a partir dos respectivos registos, para efeitos de prova em processo penal ou contra-ordenacional, respectivamente nas fases de levantamento de auto, inquérito, instrução e julgamento ou nas fases administrativa e de recurso judicial.	3 — The data obtained through the electronic surveillance equipment, in real-time or as registered footage, can be used respectively as evidence in criminal and misdemeanour litigation, from filing reports, investigations, prosecution and eventual judgements, or in administrative and court proceedings.	3—The data obtained through the electronic surveillance equipment, in real-time or as registered footage, can be used respectively as evidence in criminal or misdemeanour litigation, respectively in the stages of drawing up the official record, inquiry, finding of facts and judgement, or in administrative and appeal stages.
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The Portuguese term “auto” can have many different translations in English depending on the context, and in this case, the interpretation of this term did not correlate with that of the reviser, as highlighted above.

Another example of a mistranslation is in the first clause of Chapter IV, article 20, in line 106. In the initial translation, “na qualidade de empresas” was translated as “to ensure the quality of the entities”. However, the reviser corrected this and suggested that the concessionaires should “act as the entities”. It could be argued here that the initial translation was influenced too much by the style of the ST instead of producing a translation in accordance with the linguistic and cultural norms of British “Legal English”:

106	1 - As forças de segurança, no âmbito do presente decreto-lei, cooperam com a empresa Estradas de Portugal, E.P.E., e com as empresas concessionárias, na qualidade de entidades responsáveis pela operação dos sistemas de vigilância das condições de circulação rodoviária de que são proprietárias [...]	1 — In relation to the present Decree-Law, security forces should cooperate with the company <i>Estradas de Portugal</i> (E.P.E.) and other concessionaires, to ensure the quality of the entities responsible for the electronic surveillance systems of road traffic under their control. [...]	1 — In relation to this Decree-Law, security forces should cooperate with the company <i>Estradas de Portugal</i> (E.P.E.) and with the concessionaires acting as the entities responsible for the operation of electronic systems that monitor road traffic conditions under their control. [...]
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As mentioned briefly in *Chapter 3: Theoretical Approach to Translation*, the “EN 15038 European Quality Standard for Translation” strongly suggests that all translations be verified by a colleague or external translator before the final product is delivered to the client. As is customary at *Ad Verbum*, all revised translations are sent to translators so that they may learn from mistakes made. However, after analysing the revised translation of this document in particular, certain errors, particularly in relation to cohesion, were evident, requiring the revised translation to undergo a second revision process. Below is one example where there was a lack of cohesion on the part of the “external reviser”. In Line 16 below, the reviser decided to alter the initial translation of “nas respectivas vias concessionadas” from “on contracted roads” to “on respective roads under concession”:

16	b) As formas e condições de utilização pelas forças de segurança dos sistemas de vigilância rodoviária instalados ou a instalar pelas Estradas de Portugal, E.P.E., e pelas empresas concessionárias rodoviárias nas respectivas vias concessionadas;	b) The forms and conditions of the use by security forces of electronic traffic surveillance equipment installed, or to be installed, on Portuguese roads by <i>Estradas de Portugal</i> (E.P.E.) and concessionaires on contracted roads.	b) The forms and conditions of use by security forces of electronic traffic surveillance equipment installed, or to be installed, on Portuguese roads by <i>Estradas de Portugal</i> (E.P.E.) and by concessionaires on the respective roads under concession .
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In Line 44, however, the expression appears again, yet this time the reviser decided to stick with the original translation, or rather, “contracted roads”:

44	1 – Nos termos do artigo 13.º da Lei n.º 1/2005, de 10 de Janeiro, na reacção decorrente da Lei n.º 39-A/2005, de 29 de Julho, a empresa Estradas de Portugal, E.P.E., e as empresas concessionárias rodoviárias, nas respectivas vias concessionadas:	1 — In accordance with article 13 of Law No. 1/2005 of 10 January, amended under Law No. 39-A/2005 of 29 July, <i>Estradas de Portugal</i> (E.P.E.) and concessionaires concerning the respective contracted roads, should:	1 — In accordance with article 13 of Law No. 1/2005 of 10 January, as amended by Law No. 39-A/2005 of 29 July, <i>Estradas de Portugal</i> (E.P.E.) and concessionaires concerning the respective contracted roads , should:
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Though the meaning is essentially the same, it is imperative to use the same term cohesively throughout the document so as to avoid any possibility that the text may be misunderstood by the reader.

The main obstacles identified with this translation were the writing style used – a more “plain” English as opposed to the more customary and formal “Legal English” – as well as a lack of comprehension of the ST in certain sections of the document. If a longer deadline would have been given, the end TT product would probably have been of a higher standard. In fact, the high number of errors made was mainly due to the incredibly short deadline, meaning that the translation was completed in a rather hurried fashion in order to deliver the end product on time. A longer deadline would have given way for a more in-depth ST analysis as well as more time to study parallel texts, potentially reducing the number of problems related to terminology and writing style. This translation proved to be a useful learning curve, and the re-revised version has proven incredibly useful for other translation projects in this area, especially in terms of writing style.

In the next chapter, we move away from the area of legislation to focus on a completely different technical area: historical documents.

6. TRANSLATION 2: Letter from the Viceroy of India to the King

Key information

Document type:	Letter
Area:	History: Nautical travel, war, trade
Word count:	454
ST Language:	Old Portuguese, contemporary Portuguese
TT Language:	English
Main obstacle(s):	Intralingual translation needed

The letter from the Viceroy of India to the His Majesty the King sent in 1623 was one of the most interesting and at the same time challenging translation projects completed during the internship at *Ad Verbum*, as the document first had to be intralingually translated. Intralingual translation, as mentioned at the beginning of *Chapter 3: Theoretical Approach to Translation*, is the reproduction, or in this case, *atualização* of a text in the same language. The original ST was written in 17th Century Portuguese, but before it could be translated into English, it first had to be translated intralingually into contemporary Portuguese, conforming to the orthographic and grammatical norms of the modern-day vernacular. As this is quite a unique case, the intralingual translation process is analysed first, before comparisons between the initial and the revised translation in British English are made.

Written nearly four centuries ago, the letter posed a great number of challenges, particularly with orthography, as detailed in the passage below. This extract is taken from the very beginning of the letter:

E por hum pataxo que daquy despedy em fim de Março que Deos seria seruido leuar a saluamento tera Vossa Magestade auiso das cousas destas partes me pareceo comtudo da llo tambem a Vossa Magestade por esta Via Na forma Em que por ella se permite faze llo

Como me achey em Mocambique sem naos por a Almyranta auer Varado em terra desaparelhado dos enemigos e a capitana e São Carlos a entrada da barra de Mocambique encalharem em terra por desordem dos pilotos que me enuiou da forteleza [...]

One of the major differences we can see here is the fact that the lower-case letter “v” was commonly written as “u”. This meant that, where modern day lusophones

would be more accustomed to seeing “servido”, “salvamento” and “aviso”, in the 17th Century these words were written “seruido”, “saluamento” and “auiso”, as indicated above. For native speakers, it may have been relatively easy to simply exchange one for the other. However, for non-native speakers this different style of orthography proved rather confusing, in particular when both the letters “v” and “u” appeared in the same word, for example, “enuiou”. Another notable feature is the presence of the letter “y” in certain words which, in modern-day Portuguese, has been largely substituted for an “i”. Some examples from the extract are “daquy / daqui”, “despedy / despedi” and “achey / achei”. An interesting aspect about the letter “y” here is that, though it is quite a prevalent letter in this document, the natural evolution of the Portuguese language meant that it fell into disuse. However, it was later re-introduced, somewhat artificially, into the Portuguese alphabet as part of the Acordo Ortográfico of 1990, along with the letters “k” and “w”. These letters, however, are primarily reserved for vocabulary borrowed from other languages. Other notable differences include “Mocambique” without the “ç” – despite the fact that “recebeu” is written “reçebuo” (extract 2), contradicting what we recognise today as modern Portuguese orthographic norms – as well as the general spelling of particular words such as “Magestade / Majestade” and “enemigo / inimigo”.

As well as the orthographic obstacles highlighted above, the text also presented certain difficulties in relation to syntax. Modern-day Portuguese, particularly concerning formal technical texts, can present many problems for translators due to its convoluted, overly-complex nature, emulating the early 20th Century French academic style of writing. In the passage below, not only do we see a José Saramago-style lack of punctuation, but the actual sense of the passage is also quite hard to decipher upon first read:

[...] tratey em primeyro lugar de acudir a Ormuz que posto que Ja Naquelle tempo era perdido Não se sabia aly maes que de estar cercado E posto em aperto, e assy Negociey o galeão São Saluador que somente me ficou de que Veyo por Capitão Goncallo de Sequeira de Sousa e lhe Metty toda a Maes gente que pode leuar com que o despedy, e elle com o auiso que No estreito achou da perda de ormuz se foy metter em Mascatte que estaua muy desamparado e se reçebuo grande alento com sua chegada.

The information being communicated in this particular extract is that the author attempted to embark the Ormuz ship but discovered it was lost at sea. The Viceroy then negotiated another ship from Captain Sousa who, for fear of getting lost in the Strait of Ormuz, went to Muscat, much to his relief. Finally, the Viceroy manned the new ship and set sail.

However, due to the writing style employed by the author, and not forgetting the vast orthographic differences between 17th Century and contemporary Portuguese, this was not so easily understood. In order for the document to make sense as whole, it had to be re-written complying with modern-day Portuguese punctuation and syntax norms. After the intralingual process was completed, the following text was produced:

***Cópia da Decifração da Carta do Vice-Rei da Índia
para Sua Majestade, de 6 de Abril de 1623***

De Moçambique escrevi, com despacho enviado em duplicado por esta mesma via terrestre, dando conta a Vossa Majestade do sucesso da Viagem e das Naus pertencentes à minha companhia, que viajaram até aquela forteza, e por Carta do Cobrador de Impostos que agora reside em Mascate, fiquei a saber que, por essas duas, e posto que por elas e pelas que vão numa navetta que partiu de Cochim a quatro de fevereiro, e ainda por um pataxó que daqui despedi no fim de março, que Deus terá salvo, terá Vossa Majestade opinião sobre o que acontece nesta região e pareceu-me contudo, dever dar também conhecimento a Vossa Majestade, por esta via, na forma em que tal lhe seja permitido fazê-lo.

Como me achei em Moçambique sem naus, pelo facto de a Almyranta ter encalhado em terra, ter desaparelhado dos inimigos e de a Capitana e São Carlos, à entrada da barra de Moçambique, terem encalhado em terra por desordem dos pilotos que me enviou da forteza, e de a nau São Thome e o galeão Trindade se haverem apartado, tratei em primeiro lugar de acudir a Ormuz que, como já naquele tempo era perdido, não se sabia ali mais do que de estar cercado e posto em aperto; e assim negocieei o galeão São Salvador, que somente me ficou por ter vindo por parte do capitão Gonçallo de Sequeira de Sousa e lhe meti toda a outra gente, e ele, com o aviso de que se perderia no Estreito de Ormuz, foi-se meter em Mascate, achando-se muito desamparado, tendo com a sua chegada dado grande alento.

Partido o galeão, negocieei quatro pataxós e uma galeota de particulares e, após ter embarcado neles com a gente das naus e o dinheiro dos cabedais, da pimenta e das ajudas e de muitas partes, parti daquela forteza para esta Costa e vim procurar

cocim, onde entrei em onze de outubro. E tendo avisado logo Goa da minha chegada, o governador e mais Ministros de Vossa Majestade, para que me fosse enviada armada de remos que viesse pela costa, me chegaram, depois de muitos dias, alguns navios, poucos, em que me embarquei e cheguei a esta barra a dezassete de dezembro, achando defronte dela seis naus inimigas, a que se foram juntando outras, num total de onze, e que, apesar de estarem a tiro de bombarda, entrei com todos os navios que trazia, e que eram muitos, que de fortaleza do Melique e Canara se me foram juntando para lhes dar guarda. E a dezanove desse mês, tomei posse do governo a que o governador Fernão de Albuquerque veio e assistiu (...)

After the intralingual translation was complete, the interlingual translation process could begin. Unlike the previous translation analysed in Chapter 5, this project had a relatively large deadline. This therefore allowed time for a somewhat thorough ST analysis – based on Nord’s model – to take place. As mentioned in *Chapter 3: Theoretical Approach to Translation*, ST analysis allows a translator to create an overall strategy for translating a document and to focus on the functional properties of both the ST and the TT. Tables 9 and 10 are an example of ST analysis in practice:

Source Text Analysis (intratextual factors)	
Theme / Area	History / Nautical
Content	Letter
Presuppositions	Assumption: text for specialists in Portuguese (nautical) history, or interested persons
Non-verbal Aspects	None
Lexicon	Cobrador de impostos – Tax Collector Pataxó – Pataxo ship Encalhar – to run aground Desaperelhar – To seize/dismantle Acudir – To acquire Posto em aberto – In the open air Alento – encouragement Cabedais – hand outs Remos – rowing boats
Syntax	Relatively complicated syntax – will try and “anglicise” the text a little whilst maintaining the ST historical aspect.
General comments about overall strategy	1) Pre-translation 2) Translation 3) Revision 4) Save document appropriately 5) Send to Project Manager (send to reviser, then client)

Table 5 – Source Text analysis for *Translation 2: Letter from the Viceroy of India to the King*

Translation-Relevant Source Text Elements (extratextual factors)	
Title of Source Text (ST)	Cópia da Decifração da Carta do Vice-Rei da Índia para Sua Majestade, de 6 de Abril de 1623
Name of file	Copia do Decifrado da Carta do Vizo rrey da Jndia
Number of words	454
Date received	07-May-2014
Source language	Portuguese
Target language	English
Deadline	09-May-2014
Supporting material	1) http://figal-sensei.org/hist108/Text/er/hideyoshi.pdf (letter written at around the same period addressed to a person of similar status)
Client	Alphatrad
Publisher of Text	-
Author(s)	Portuguese Viceroy for India (1623)
Function of ST	To inform the King of Portugal at the time of the nautical and commercial situation in the East.
Function of Target Text (TT)	Text to be understood by modern reader (register and style do not need to strictly maintained)
Text type (ST)	Technical (historical)
Text type (TT)	Technical (historical), Instrumental
ST Recipients	King of Portugal (1623)
TT Recipients	Historian, interested persons
Time and place ST received	Ad Verbum (Lisbon): 08-05-14, 16:50
Objective of ST and TT	Objective of ST – inform of naval situation in the East Objective of TT – perhaps to inform modern-day historians or interested persons about Portuguese exploration in the 17 th Century

Table 6 – Translation-relevant Source Text elements for *Translation 2: Letter from the Viceroy of India to the King*

Despite the fact that the orthography had undergone a process of *atualização* and the syntax had been modified to conform with modern-day standards, the content of the text still proved quite complex in certain parts, due in large part to the unfamiliar nautical terminology and idiomatic expressions employed by the author.

As the full translation of the document written in contemporary Portuguese has already been given above, only the initial translation and the revised translation are featured below in order to avoid needless repetition. Though the initial document was written in 17th Century Portuguese, it was not imperative to reproduce exactly the writing style and formal register used in the ST in the TT, as the TA of the TT was not

the King of Portugal, nor anyone of royal descent, but rather historians and/or interested persons. It was necessary, however, to modify the syntax slightly, substituting the typically convoluted Portuguese writing style for a more direct, and arguably more comprehensible, English style.

In general, the revised translation did not vary greatly from the initial translation. In the first section of the text, little alteration was made in the revised translation:

Line	Initial Translation (EN)	Revised Translation (EN)
01	From Mozambique I write, with the order to be sent in duplicate by this very land route, informing Your Majesty of the success of the voyage and the ships belonging to my company, which travelled up to the fortress. Through correspondence with the Tax Collector, who now resides in Muscat, Oman, I have become aware that through these two routes, through these and those along which departed a navette on a voyage from Kochi on the fourth of February, as well as the pataxo ship which set sail at the end of March, which God shall watch over, Your Majesty will undoubtedly have an opinion about what is occurring in this region. It therefore seemed pertinent to inform Your Majesty, in writing, about the way in which such is permissible.	From Mozambique I write, with the order to be sent in duplicate by this very land route, informing Your Majesty of the success of the voyage and the ships belonging to my company, which travelled up to the fortress. Through correspondence with the Tax Collector, who now resides in Muscat, Oman, I have become aware that through these two routes, through these and those along which a navette departed on a voyage from Kochi on the fourth of February, as well as the pataxo whose departure I ordered at the end of March, and which God shall watch over, Your Majesty will undoubtedly have an opinion about what is occurring in this region. It therefore seemed pertinent to give knowledge to Your Majesty, in writing, about the way in which such is permissible.

However, in the second section of the document, more substitutions were made. The reviser decided to substitute “port” for “harbour” due to the fact that the latter sounded more appropriate given the historical context:

02	As I found myself without ships due to the Almyranta running aground and being seized/dismantled by enemies, the Capitã and the São Carlos running aground upon entering the port as the crew, sent from the fortress, disobeyed orders, and the São Tomé ship and Trindade galleon having already departed, I initially intended to acquire the Ormuz, but, as the vessel was already lost at that time, all that was known was that it was surrounded and in the open air . It was then that I negotiated the São Salvador galleon, which only came into my possession for having been captained by Gonçallo de Sequeira de Sousa, and set sail with a full crew. After being warned that he would get lost in the Strait of Hormuz, the captain went to Muscat feeling helpless, receiving encouragement upon arrival.	As I found myself without ships due to the Almyranta running aground and being seized and dismantled by enemies, the Capitana and the São Carlos running aground upon entering the harbour , as the crew, sent from the fortress, disobeyed orders, and the São Thome ship and Trindade galleon having already set sail , I initially decided to approach the Ormuz, but, as it was already lost at that time, all that was known was that it was surrounded and in a poor condition. It was then that I negotiated the São Salvador galleon, which only came into my possession for having been captained by Gonçallo de Sequeira de Sousa, and set sail with a full crew. After being warned that he would get lost in the Strait of Hormuz, the captain went to Muscat feeling helpless, receiving encouragement upon arrival.
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The section highlighted in red was a mistranslation of the term “posto em aperto”. In context, the expression could not be easily deduced:

“tratei em primeiro lugar de acudir a Ormuz que, como já naquele tempo era perdido, não se sabia ali mais do que de estar cercado e posto em aperto”

After having conducted some research online, the idea of “posto em aperto” to signify ‘lost at sea’ seemed like a possible solution and, given the context, seemed like a logical reason for not using a particular vessel – especially one whose location the author himself stated was unknown. However, the reviser corrected this to “in a poor condition”.

Towards the end of the document, the reviser felt that the style of the translation was inadequate. One of the more problematic sentences was the following:

“após ter embarcado neles [os quatro pataxós e uma galeota] com a gente das naus e o dinheiro dos cabedais, da pimenta e das ajudas e de muitas partes, parti daquela fortaleza para esta Costa”.

This sentence was initially translated as: “after manning and stocking the vessels and with the money made from goods, as well as spices, hand outs and many parts, I departed that fortress towards this Coast”, sticking closely to the syntax of the original

Portuguese text. However, the reviser decided to change the sentence into a more active structure: “I took the money from the leather and pepper I sold, from the various aids and other parts, and I departed [...]”, which, though further from the style of the original document, flows a lot better and is essentially easier to understand by an English-speaking TA in comparison to the initial translation. The reviser also corrected the mistranslation of “cabedais” from “hand outs” to “various aids”:

03	<p>Along with the galleon, I also negotiated four pataxos and a private galley ship and, after manning and stocking the vessels and with the money made from goods, as well as spices, hand outs and many parts, I departed that fortress towards this Coast and I came looking for Kochi, where I arrived on the eleventh of October. Before arriving, I notified Goa, the governor and some of Your Majesty’s Ministers, so that I would be sent an armada of rowing boats from the coast. After many days, a few ships arrived. I embarked and arrived at the entrance of the port on the seventeenth of December, soon discovering the presence of six enemy ships, being joined by others, making a total of eleven. Despite the cannon fire, I entered the port with the all the vessels I had brought, which were now great in number as ships from the fortress of Melique and Canara had been steadily joining my fleet for protection. On the nineteenth of December, I took up office which Governor Fernão de Albuquerque came and witnessed (...)</p>	<p>Along with the galleon, I also negotiated four pataxos and a private galley and, after manning and stocking the vessels, I took the money from the leather and pepper I sold, from the various aids and other parts, and I departed that fortress towards this Coast and I came looking for Kochi, where I arrived on the eleventh of October. Upon my arrival, I notified Goa, the governor and Your Majesty’s Ministers, so that I would be sent an armada of rowing boats from the coast. After many days, just a few ships appeared. I embarked and arrived at the entrance of the harbour on the seventeenth of December, soon discovering the presence of six enemy ships, being joined by others, making a total of eleven. Despite the cannon fire, I entered the harbour with all the vessels I had brought, which were now greater in number, as ships from the fortress of Melique and Canara had been steadily joining my fleet for protection. On the nineteenth of December, I took up office, which Governor Fernão de Albuquerque came and witnessed (...)</p>
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This translation proved interesting in a number of ways. Besides the fact that the letter gave an insight into Portuguese naval history, it also allowed the translator to see the development and evolution of the Portuguese language. As with the first translation in Chapter 5, writing style once again proved problematic. Though the first part of the translation remained relatively constant and unaltered by the reviser, the writing style towards the end of the document was in some parts deemed inadequate for the purpose of the TT.

The fact that the translation not only had to be translated intralingually, but that the intralingual translation was in another language, with orthography norms from over three and a half centuries ago, proved indeed as challenging as it sounds. However, the translation process for this particular document was made easier with the use of parallel

texts. As it happens, the same client had requested the translation of a similar document earlier in the week. The informative document, concerning merchant protests in India occurring at around the same period, presented similar difficulties in relation to orthographic differences and convoluted sentence structures. Translating this first document facilitated the translation of the document analysed in this chapter, allowing experience to be acquired in the translation of historical texts, differing greatly to the legislative project analysed in Chapter 5.

In the next chapter, we move away from the area of historical and intralingual translation and focus more on technical translation in the area of science and technology.

7. TRANSLATION 3: Specifications for robots – deactivating explosives

Key information

Document type:	Technical specifications
Area:	Science: robot specifications – deactivation of explosive devices
Word count:	1401
ST Language:	Portuguese
TT Language:	English
Main obstacle(s):	Scientific terminology, writing style

As with the historical document in the previous chapter, this translation project also proved incredibly interesting. Not only did it provide a welcome relief from the countless number of certifications which had to be translated, but the content matter in itself was fascinating – it is not every day that a translator is granted an insight into the construction and component features of a robot used for deactivating bombs and other explosive devices.

Due to the relatively large deadline, there was sufficient time to conduct a thorough ST analysis based on Nord's model, not dissimilar to the analysis completed for the historical document in the previous chapter. Tables 11 and 12 represent Nord's ST analysis theory in practice:

Source Text Analysis (intratextual factors)	
Theme / Area	Science / Technology / Business
Content	i – Objecto 1 – Generalidades 2 – Descrição do objecto de aquisição 3 – Requisitos essenciais Mobilidade / Peso / Dimensões / Resistência / Video, audio e iluminação / Consola / Manipulador / Canhão de disruptor / Caixa rígida / Mochila de transporte / Construção e Manutenção 1º escalão 4 – Manutenção 5 – Apoio Técnico 6 – Memória descritiva 7 – (<i>sem título</i>) 8 – Referências do fabricante 9 – Qualidade 10 – Documentação aplicável Structure to be kept the same (no need to change – function of ST and TT exactly the same) – create title for <u>chapter 7</u>
Presuppositions	TA – specialists in technology / scientific fields
Non-verbal Aspects	None
Lexicon	Engenhos – devices Canhão disruptor acoplável – attachable disarming device Braço Manipulador – robot arm Cartuchos – cartridges Lagartas – tracks Local exíguo – tight spaces Sobressalentes – spare parts
Syntax	No complex syntax
General comments about overall strategy	1) Pre-translation 2) Translation 3) Revision 4) Save document appropriately 5) Send to boss (to be sent to reviser, then client)

Table 7 – Source Text analysis for *Translation 3: Specifications for robots – deactivating explosives*

Translation-Relevant Source Text Elements (extratextual factors)	
Title of Source Text (ST)	Especificação Técnica (ET) para um veículo de controlo remoto ligeiro para reconhecimento e inspeção de engenhos explosivos
Name of file	ESPECIFICAÇÃO TÉCNICA
Number of words	796
Date received	02-April-2014
Source language	Portuguese
Target language	English
Deadline	04-April-2014
Supporting material	1) http://www.cobham.com/media/853999/telemax_explosive_ordnance_eod_robot_-_brochure_extract.pdf 2) http://www.militarysystems-tech.com/files/militarysystems/supplier_docs/EOD%20Brochure.pdf 3) http://www.army-technology.com/contractors/mines/telerob/ 4) http://www.azorobotics.com/equipment-category.aspx?cat=16 [and so on]
Client	XXXXX
Publisher of Text	-
Author(s)	-
Function of ST	Specifications for creation of robot for deactivating explosive devices
Function of Target Text (TT)	Specifications for creation of robot for deactivating explosive devices
Text type (ST)	Technical
Text type (TT)	Technical, Instrumental
ST Recipients	Technological / scientific companies (reader familiar with complex terminology)
TT Recipients	Technological / scientific companies (reader familiar with complex terminology)
Time and place ST received	Ad Verbum (Lisbon): 02 April 2014, 10:30
Objective of ST and TT	Objective of ST and TT – outline specifications for robots for deactivating explosive devices

Table 8 – Translation-relevant Source Text elements for *Translation 3: Specifications for robots – deactivating explosives*

After the ST analysis was complete, the transferral process could begin. Unfortunately, due to the highly sensitive nature of this document, and after having discussed the issue with colleagues at Ad Verbum, it was decided that sections 4-10 of the document, the full copy of which can be found in the appendices, must be omitted from the report as they either contained personal information about the client or other information which should not be made public. In accordance with the guidelines given

in *Chapter 4: Practical Approach to Translation*, any remaining sensitive information has been substituted with “XXXXXX”. Certain information which is repeated throughout the document – including irrelevant headers and footers, document information, signatures and so on – has also been omitted as it does not really add anything to the translation analysis and is not considered a key part of the ST.

One of the nicer aspects about this translation project was that there were lots of parallel texts online specifically with technical specifications for the construction of robots for deactivating bombs and other explosive devices. These were therefore used as guidance to help with the completion of the TT during the transferral stage. Also, unlike with the legislative translation analysed in Chapter 5, and somewhat with the historical letter analysed in Chapter 6, which had to undergo intralingual *and* interlingual translation, there were only a few difficult technical terms requiring a certain amount of research in order to determine the correct equivalent in English. However, with the use of tools such as online dictionaries and technical glossaries, such as the website *Linguee*, the equivalents were easily found and incorporated into the document accordingly.

Although there were very few mistranslations, and noticeably fewer errors – possibly thanks to the ST analysis completed – there were a couple of discrepancies between the initial and revised translations of the ST, for example, in section b of paragraph 2 “Description and use of the object”:

<p>b. A área de aplicação é reconhecimento e vigilância no campo de batalha em zonas urbanas e inativação de engenhos explosivos, com a potencialidade de ser projetável em viatura táctica ligeira e transportável manualmente por apenas 01 (um) operador. XXXXXX</p>	<p>b. The RCV is to be used in the areas of recognition, surveillance in battlefields and urban areas, and deactivation of explosive devices, with the potential to be designed as a tactical light vehicle and to be manually transported by just one operator. XXXXXX</p>	<p>b. The RCV is to be used in the areas of recognition, surveillance in urban battleground areas, and deactivation of explosive devices, with the potential to be designed as a tactical light vehicle and to be manually transported by just one operator. XXXXXX</p>
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Where the ST talks about areas where the robot will be used, the sentence “no campo de batalha em zonas urbanas” was initially translated as “in battlefields and urban areas”. However, the reviser later corrected this to “in urban battleground areas”. After some cogitation, the revised translation is better given the context and is essentially more accurate as it is closer to the message of the original. We see also in

this section the use of the word “sturdy”; this term was perhaps considered too informal for this type of scientific document. When this obstacle first presented itself, the term “rigid” was considered a possible translation, but eventually “sturdy” was chosen due to its connotations with strength and reliability as opposed to the negative connotations of inflexibility and stiffness that “rigid” can have. However, the reviser felt that “rigid” was the more adequate translation and was sufficient for conveying the desired message of the author.

There were also other examples of where the reviser had decided to alter the syntax of a phrase, or include/omit certain words and/or phrases, in the “General Instructions” section. However, due to confidentiality reasons already mentioned above, it was decided to omit these sections. Therefore, the alterations made in this section cannot be analysed in greater detail.

In the second and final section of the document, the defining characteristics and specifications of the robot itself, including size, weight, specific functions and detachable parts, are listed.

One of the main difficulties with this translation, as with the legislative translation in Chapter 5, and somewhat with the historical translation in Chapter 6, was the style of writing, and certain stylistic errors made in the initial translation became more evident in the second section of the ST document, for example, in section b of paragraph 3 “essential requirements”:

<p>b) <u>PESO [2]</u></p> <ol style="list-style-type: none"> 1. Até 10 kg com sistema de mobilidade; 2. Até 30 kg com equipamento acoplado; 3. Transportado manualmente por um só operador. 	<p>b) <u>WEIGHT [2]</u></p> <ol style="list-style-type: none"> 1. Mobility system up to 10kg 2. Attached equipment up to 30kg 3. Easily transported by just one operator 	<p>b) <u>WEIGHT [2]</u></p> <ol style="list-style-type: none"> 1. Up to 10 kg with mobility system. 2. Up to 30 kg with attached equipment. 3. Easily transported
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The first bullet point of the ST dictates that the weight of the robot can only be “até 10 kg com sistema de mobilidade”, implying that the robot, as well as the mobility system, can have a combined total weight of 10 kg. However, the initial translation “Mobility system up to 10kg” could be interpreted as meaning that the robot could accommodate a mobility system weighing up to 10 kg itself. This was subsequently modified by the translator, who instead opted for “up to 10 kg with mobility system”. The second bullet point was also subject to a similar mistranslation. Whereas the

original stated that the weight of the robot can only be “até 30 kg com equipamento acoplado”, this was initially translated as “attached equipment up to 30 kg”, again, giving the impression that the robot could accommodate attached equipment up to a total weight of 30kg. As with the first bullet point, this was hastily substituted by the reviser for “up to 30 kg with attached equipment”, sticking closely to the original ST.

In part J, the writing style employed was deemed inadequate. The line “permitindo transporte acondicionado do equipamento e acessórios” was initially translated as “allowing for storage of equipment and accessories during transportation”. However, the reviser later changed this, substituting it with: “for stowing and transporting the equipment and accessories”, as “stowing” captured better the message of the original ST.

This technical text showed certain parallels with the legislative document translated in Chapter 5 insofar as they were both quite lengthy texts and their respective subject matters were completely unfamiliar. Whereas the approach taken with the legislative document was to simply ‘translate and hope for the best’, this document tried to reproduce a high quality translation in a more natural-sounding fashion, thinking more about how the text would read for the TA – based upon the idea of “Natural Equivalence” as mentioned in *Chapter 3: Theoretical Approach to Translation*. Though mistakes were indeed made in the transferral process, overall it fared a lot better than the initial TT of the legislation document. This phenomenon could also be down to ST analysis. Whereas there was no time to perform an ST analysis of the legislative document, resulting in what can only be described as a TT ‘littered’ with stylistic and terminological errors, the ST analysis conducted for this document was relatively thorough and overall helped produce a better quality translation product.

In the next chapter, we take a look at the fourth translation analysed in this report, dissecting problems in the area of translation via a “relay language”, as well as posing questions about the extent to which the theory of “Natural Equivalence” can and should be used in an academic context.

8. TRANSLATION 4: University Transcript

Key information

Document type:	Transcript, educational certificate
Area:	Academia: Subjects studies, grades awarded,
Word count:	701
ST Language:	Portuguese (Ukrainian)
TT Language:	English
Main obstacle(s):	Equivalence, relay translation

This translation, unlike the first three translations analysed in this internship report, did not really present obstacles relating to complex subject matter or unusual writing style. It did however pose difficulties concerning TL equivalence and to what extent a document should be adapted for a TA. However, the first obstacle to be discussed concerns the idea of “relay languages”.

An interlingual translation, as mentioned in *Chapter 3: Theoretical Approach to Translation*, is when a ST is translated from one language to another. Usually, the language of the ST is the original language the document was written in. However, it is sometimes the case that, due to a lack of qualified translators, either in general or simply at the disposition of a translation agency at any one particular time, a document must pass through another language first *before* it can be translated into the required TL. This is often what happens, for example, in the video gaming world; due to a lack of translation combinations including Japanese, videogames from Japan are more often than not directly translated into American English, acting as the middle or “relay” language, before they are then localised for all the different desired markets around the world, either with dubbed dialogue or subtitles and almost always with translated internal menus. The videogame localisation industry, from its humble beginnings in the 1980s, is today considered an incredibly lucrative industry as gaming companies appeal to wider audiences in their native tongue and expand into evermore international markets.

However, there are certain concerns in relation to translation via relay languages – the main argument being that with relay translation, there will inevitably be a loss of detail and/or information given in the original ST. When producing the American English version of a videogame, certain information, for whatever reason, may be omitted, perhaps due to it being considered irrelevant or because the translator is thinking about the function of the TT within the framework of the American TA. Yet,

once this information has been omitted, it cannot then be retrieved for the localised version of the videogame as it is not present in the American English translation - potentially resulting in the loss of the colouring of a particular scene or inter-character relationship.

Thought there is not a direct link between the the video gaming world and the next translation analysed, the latter also had to pass through a relay language before reaching its target language of English.

The document, a university transcript issued by the Cherkasy Engineering and Technological Institute, was initially written in Ukrainian. However, Ukrainian is not one of the languages that *Ad Verbum* commonly works with. Therefore, in order for the document to be translated, it first had to be translated into Portuguese. Besides the fact that relay translation always runs the risk of losing certain details of a text, as mentioned above, it also means that a translator becomes dependent on the work of another, without knowing whether the relay TT produced is an accurate translation of the ST original. Another problem lies in the *way* the document has been translated. The translator who is translating from the relay language to the TL does not know whether the relay translation has been adapted, in this case, for a Portuguese audience – modifying the details of the document in accordance with the Portuguese education and university grading system – as “one should translate what texts are supposed to do, their intended function, not the actual *words* on the page (Pym 2010: 57). This, however, presents a further problem.

If, after the ST has been adapted for a Portuguese audience, the document is then further adapted for a British audience, selecting subjects available on similar courses at academic institutions in the UK, based on the information provided in the Portuguese relay translation, the English ‘equivalents’ might be completely different to the Ukrainian originals. In the areas of technology and engineering, this might not pose such a big problem, but let us argue that, for example, this university transcript was from a *medical* institute in Ukraine – an inaccurate translation could mean that a British hospital understands the holder of the certificate to have certain medical competences and capabilities that they simply do not have.

Unfortunately, the Ukrainian original was unavailable. The Portuguese transcript, however, is comprised of two documents; the first, found in the appendices, is a comprehensive list of all the modules completed by the certificate holder, and the second, the certificate issued by the higher education institute itself. All dates and

names have been omitted in order to protect the identity of the certificate holder, as outlined in *Chapter 4: Practical Approach to Translation*.

One of the very first obstacles encountered with this translation was the very name of the issuing institution. Today, the “Cherkasy Engineering and Technological Institute” is now better known as the “Cherkasy State Technological University”. This alteration presented a problem as it was, technically, the former institution which issued the certificate, whose name presumably appears on the Ukrainian original and where the student actually studied. Yet, if we consider the TA and the function of the text, the translation is for contemporary use and not historical archiving; if a British university or employer wished to be better informed about the student, the course or the institution itself, it would not come across the information easily due to the fact that the issuing body no longer exists. On the other hand, it could be argued that the alteration of the name of the issuing institution would be too much interference from the translator whose presence, according to some, should be neither seen nor felt, as mentioned in *Chapter 3: Theoretical Approach to Translation*. In the end, the decision was taken to maintain the name of the issuing institution as this translation is meant to be a replication of the ST in the TL – the fact that it no longer exists is irrelevant.

Earlier on in the chapter, some reservations were made about translating using relay languages. In this particular case, the Portuguese relay text was taken to be accurate, and the theory of “Natural Equivalence” was used throughout the transferral process. Research was conducted online to look at academic programmes of similar courses at British universities (where necessary) in order to arrive at the best translation possible for the British TA. For module 8, the Portuguese “politologia” could very well have been translated for “politology”. However, this term is used rather infrequently in the UK. Therefore, this subject was translated as “political sciences”. Although it could be argued that “political sciences” is not exactly the same as “politology”, the term is used a lot more frequently both in social and academic contexts as an ‘umbrella term’ for all the different possible denominations.

Modules 13, 17 and 31 – “Princípios de Direito Constitucional”, “Mecânica Teórica” and “Prospeções de Engenharia” respectively – were also translated using “localised” British terms instead of direct translations. This then gave the following: “Introduction to Constitutional Law” as opposed to “Principles of Constitutional Law”, “Theoretical Mechanics” as opposed to “Theory of Mechanics”, and “Prospecting” as the term in itself, given the context, implies that it is in the field of engineering.

Even though the grading system in the UK is completely different to the Ukrainian/Portuguese systems, and on further reflection appears rather complicated in comparison to the systems of its European neighbours (students are awarded grades between 30 and 90), the decision was made to simply translate the grades as they appeared in the Portuguese text. Though they may be different to what British eyes are accustomed to seeing, they would not be totally incomprehensible to an English-speaking audience. Also, it would be nigh-on impossible for a translator to equate “bom”, “excelente”, “aprovado” and so on, with British numerical grades.

The second section of this project concerns the diploma certificate:

<p>UCRÂNIA</p> <div style="text-align: center; margin: 20px 0;">  </div> <p>DIPLOMA DE ESPECIALISTA</p>	<p>DIPLOMA</p> <p>LG VE Nº XXXXX</p> <p>XXXXX concluiu o curso do Instituto de Engenharia e Tecnologia de Cherkasy na especialidade de Construção Civil e Industrial.</p> <p>Por decisão da Comissão Estatal Examinadora de 20 de junho de 19XX, a XXXXX foi concedida a qualificação de especialista – Engenheiro de Construção Civil.</p> <p style="text-align: right;"><i>O Presidente da Comissão Estatal Examinadora</i> [assinatura]</p> <p style="text-align: right;"><i>O Reitor</i> [assinatura]</p> <p style="text-align: center;">O Secretário [assinatura]</p> <p>Cidade de Cherkasy 27 de junho de 19XX</p> <p>Registo Nº XXXXX</p> <p>Carimbo: Ministério da Educação da Ucrânia Instituto de Engenharia e Tecnologia de Cherkasy</p>
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With this section of the document, there were no real problems concerning translation as such, largely because the document is less than 100 words long and most of the information is repeated from the transcript. However, the format of the document itself did not look very professional and on a par with a certificate issued by a British academic institution. Therefore, after the translation was concluded, the document was reformatted so that it looked more professional, even if it did not look equal to the original Ukrainian certificate.

<p>UKRAINE</p>  <p>SPECIALIST DIPLOMA</p>	<p>DIPLOMA</p> <p>LG VE No. XXXXX</p> <p>It is hereby certified that XXXXX Finished the course a Cherkasy Engineering and Technological Institute in Civil and Industrial Construction.</p> <p>As determined by the State Examination Board on 20 June 19XX, XXXXX was awarded the qualification of Civil Construction Engineer.</p> <p>President of the State Examination Board <i>[signature]</i></p> <p>President <i>[signature]</i></p> <p>Secretary <i>[signature]</i></p> <p>Cherkasy, 27 June 19XX</p> <p>Registration No. XXXXX</p> <p>Stamp: Ministry of Education of Ukraine Cherkasy Engineering and Technological Institute</p>
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Out of all the translations analysed in this report, this academic project was arguably the easiest and the one where the fewest number of mistakes were made. This may be because academic texts, including their formatting, register and so on, are more

familiar to Master's Students and trainee-translators, as opposed to documents in technical fields outside the area of expertise of a translator. This translation project showed that even though "Natural Equivalence" may not be the most popular translation theory applied by translators nowadays, it does not mean that it is entirely *useless*. As mentioned previously in this report, "Natural Equivalence" allows a document to sound more natural in the TL, with a focus placed on the TA. Though some titles of the modules were easier to translate than others, for example, "História da Ucrânia / History of Ukraine", others were more challenging, and a simple 'direct translation' would not have sufficed.

It is a shame that the original Ukrainian document was unavailable for comparison, as it would have been incredibly interesting to back translate the document – where a TT is translated back into the original SL to see if the translation corresponds with the ST – and compare the English translation to the original Ukrainian document (inability to speak Ukrainian notwithstanding). It would also have been interesting to see just how well relay translation can work despite all the negative connotations attached to it.

In the next chapter, we take a look at the obstacles presented with documents in the area of economics, and in particular analysing the area of terminology.

9. TRANSLATION 5: Grant Thornton – Statutory Auditor’s Report

Key information

Document type:	Legal certification and professional opinion
Area:	Economics: Statutory Auditor’s report
Word count:	800
ST Language:	Portuguese
TT Language:	English
Main obstacle(s):	Terminology, Syntax

In the final translation analysis of this Internship Report, we take a closer look at the field of economics. Though this may not be the most interesting document out of the ones presented in the report, it has been included as a representation of the main type of translations completed during the three month internship (excluding certifications). To not include a document in this area would not be giving an honest representation of the body of work completed. It also shows just how versatile a contemporary translator has to be and the extent to which they have to possess knowledge in a plethora of different technical areas; one day, a project in the field of economics arrives, the next, technical specifications for robots, and the next, a letter written in the 17th Century from the Viceroy of India to the Portuguese King.

In this document, *Grant Thornton* was commissioned to produce a Statutory Auditor’s Report for a company whose name has been withheld for confidential reasons. This document is not the report itself, but summarises the activity carried out during the report, as well as offering a professional financial opinion of accuracy and truth to the recipient.

As there was a relatively short deadline for this project, there was no time to complete a thorough ST analysis like with the translations of the historical and technical/scientific projects in chapters 6 and 7 respectively.

The original Portuguese document, as well as the translated document in English, can be found in the appendices. Both documents underwent certain formatting changes in accordance with the formatting of this report, but none of the content has been altered (apart from the substitution of the name of the client).

One of the main difficulties concerning this translation project was indeed the syntax. As mentioned previously, written Portuguese, particularly in official texts or

correspondence, can be quite complex, convoluted and appear strange to a non-native eye. An example of this is at the end of paragraph 7:

Contudo, a empresa não efetuou um teste de imparidade para determinar se o montante, pelo qual aqueles ativos se encontram refletidos no balanço anexo, é superior ao respetivo valor de mercado ou de recuperação, pelo que, na ausência da referida análise de imparidade, não nos foi possível quantificar o eventual efeito, se algum, desta situação nas demonstrações financeiras anexas.

If we were to do a direct stylistic translation of this paragraph into English, it would be very confusing for the TA purely because standard English is traditionally written in a more simplistic, direct fashion with much less ‘embellishment’ than Portuguese. This therefore meant that the document had to be adapted and the syntax changed so that it would read as though it were originally written in English, the TA of the TT:

However, the company had not conducted an impairment test to determine if the sum (the figure of which – as outlined in the attached balance – includes the aforementioned assets) is higher than the respective market or recovery value. Without the impairment analysis, it was impossible to measure the effect, if any, of this situation on the attached financial statements.

In the English translation, brackets have been used to include additional information but not draw focus away from the more important content. The paragraph has also been separated into two shorter sentences so that it retains a sense of fluidity when being read and to ensure that the TA can easily comprehend the text without being overwhelmed by complex, long-winded sentences.

Unlike with previous translation projects, there was no real problem in relation to writing style. Throughout the course of the transferral process, parallel texts were consulted in order to ascertain how particular ideas and concepts in the field of economics were expressed in English. Nevertheless, this document is a technical text, and as such, there were obviously certain problems in relation to Portuguese terminology and their equivalents in English.

In paragraph 1, there were many different types of commercial and non-commercial *demonstrações*, or financial statements, mentioned:

Examinámos as demonstrações financeiras da XXXXX, as quais compreendem o Balanço [...], as Demonstrações dos resultados por naturezas e por funções e a Demonstração das alterações no capital próprio e a Demonstração dos fluxos de caixa do exercício findo naquela data, e o correspondente Anexo

In this case, online reliable translation forums such as PROZ and banking websites in Portugal were consulted to determine what each of the statements detailed in the text represented in Portugal as well as the information they provided to the reader. Further research then had to be conducted on British banking websites to see if the translation equivalents found transmitted the same financial information to the client in order to avoid any misunderstanding on the part of the reader. It was discovered, however, that the translated terms did indeed represent the same ideas and concepts as the Portuguese terms, and the section could be translated without any further delay:

We examined the financial statements of XXXXX, comprised of the Balance [...], the income statements by nature and by function, the statement of changes in equity and the cash flow statement, for the year then ended, as well as the corresponding annex.

Overall, the translation went pretty smoothly, granted that no ST analysis was performed beforehand. This was not the first translation project completed in the area of economics, yet it shows that with practice, a translator can acquire vast amounts of knowledge about language and general subject matter in various other technical areas. Though this type of document is not the most interesting to translate, it is the most frequent to arrive at a non-specialised translator's desk. It could therefore be argued that it is the most lucrative area of the translation industry in comparison to, say, literary translation, and so any practice a translator at the start of their career can get in this area can only be beneficial.

10. CONCLUSION

Over the course of the three-month internship, many translations were completed in a wide variety of different technical areas. The translations chosen for analysis hopefully represent that diversity, whilst also showing how translation theory can be applied to everyday translation work with the objective of producing end products of high quality.

The internship itself was chosen instead of the research project because it was deemed important to gain practical experience in the field working for a translation agency and producing translations for real clients. Personally, the three-month internship did not feel long enough – though certain competences were improved, for example, time management, research and organisation skills, it felt as though by the end of the internship there was still so much more to learn and a lot of room for improvement. Thankfully, *Ad Verbum* provided the opportunity to continue working with them in-house so as to develop professionally as well as gain more knowledge and experience translating technical documents, mainly in the fields of economics and legislation.

The EMT course served as a good foundation from which to grow. However, if any changes were to be made, perhaps the course could benefit from placing a greater emphasis on the practical side of translation. When the internship first began, it came as quite a surprise to have to complete translations in complicated technical areas for the very next day. Throughout the EMT course, students often had a whole week to translate one single document, reflect upon it and alter it as they pleased. There also seemed to be a bit of an imbalance in favour of the theoretical approach to translation as opposed to the practical approach, though this is not to say that the study of translation theory is at all secondary to translation practice.

Learning translation theory is useful for learning about the techniques needed in order to produce a translation of high quality. However, it could be argued that translation theory is not ‘the be all and end all’ of translation, because, as any qualified translator can tell you, when a lengthy translation project with an incredibly short deadline arrives, there is simply not enough time to be thinking about the principles of translation theory and of what, for example, Reiss and Vermeer once said in the 1980s. The translation project simply needs to be completed, revised and sent back to the client – such is the fast-paced professional world we live in today.

It is important, however, that there are rules and guidelines governing the translation industry so as to prevent products of bad quality being sent to clients by ‘translation cowboys’. Initiatives like the The European Commission’s “EN 15038 European Quality Standard for Translation”, and APET, the Portuguese Association of Translation Agencies, aim to regulate the industry and ensure all parties in the translation process are satisfied with the process, end product and payment.

Completing an internship at a translation agency allows a trainee-translator to acquire greater experience in the field. Though it is the norm, both in Portugal and the UK, it would have been beneficial to receive some remuneration for the works completed. The economic situation in Portugal at the moment is not positive, to put it politely, and being obliged to work for free is not really viable, especially considering the living expenses attached to residing in the capital.

However, though it is all very well studying Translation and Linguistic Services at university, and completing an internship in the respective field – has it all been worth it? Is the death of the human translator inevitable given the rise in popularity of machine translation, such as the online tool “Google translate”? Can a translator survive when market prices continue to be so astonishingly low?

For these questions, unfortunately, there are no clear-cut answers because nobody knows what the future may hold. For the time being, there is still a place in the market for human translators as machine translation is incapable of producing natural sounding TL translations of ST documents. Machine translation cannot pick up on the poetic nuances of particular texts, nor can they apply the rules of “Natural Equivalence” when translating, for example, idiomatic expressions, as this still requires human knowledge of both the SC and the TC. Machine translation is useful for the translation of particular terms, but it seems rather limiting to use, for example, “Google Translate”, when there are other, arguably better websites that can be used such as *IATE*, a multilingual termbase used by the European Institutions, and *Linguee*. *Linguee* offers translators the opportunity to see an aggregate of extracts from documents where a term is used in a specific context, as well as translations of those documents for comparative purposes, although the search results are not always reliable. The website was often used to assist with the translations analysed in this report as well as the other translations completed throughout the course of the internship, listed in *Annex III – Comprehensive list of Translations Completed*, of the appendices.

The price that translators are paid however does not reflect the hours of hard work, background research, and time spent reformatting a text, adapting it so that it functions in the TL and effort put in to ensure that the end product arrives to the client on time. If the profession of a translator, and the translation industry in general, is to gain any credibility from other professional industries, a united front must be formed by *langagiers*, instead of the competitive nature of contemporary translators who under-cut one another vying for translation work, but as a result, keep prices way below what they should be.

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APPENDICES

ANNEX I – DECLARATION OF AUTHORISATION FOR USE OF MATERIAL



Lisboa
T. +351 213 950 061
F. +351 213 950 062
adverbumlisboa@ad-verbum.com
Av. 5 de Outubro, nº151 - 7ºD
1050-053 Lisboa

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(Ana Leonor Jorge)

Orientadora de Estágio

(Rita de Brito Aranha)

Diretora

ad-verbum

Serviços de Tradução e Interpretação Lda
Cont. nº. 502 346 809

ANNEX II – DECLARATION OF COMPLETION OF INTERNSHIP



Lisboa
T. +351 213 950 061
F. +351 213 950 062
adverbumlisboa@ad-verbum.com
Av. 5 de Outubro, nº151 - 7ºD
1050-053 Lisboa

DECLARAÇÃO

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Lisboa, 28 de Agosto de 2014

(Ana Leonor Jorge)

Orientadora de Estágio

(Rita de Brito Aranha)

Diretora

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**ANNEX III – COMPREHENSIVE LIST OF TRANSLATIONS COMPLETED
FEBRUARY**

Date	Name of Document	Words	Description
17	PS_021256059	372	Status report - vehicle insurance
18	PS_021256056	359	Status report - vehicle insurance
	Certidão XXXXX 1	124 / 2391	Permanent certificate – Ministry of Justice
	Certidão	105	Certificate of Good Standing – Revenue and Customs
	Declaração	113	Declaration of Good Standing – Social Security
19	Certidão Permanente XXXXX	1731	Permanent certificate – Ministry of Justice
	Certidão_AS	155	Cert. Good Standing – Revenue and Customs
	Declaração	107	Decl. Good Standing – Social Security
20	7594_FLHT Liberty LarPlus_af3	1030	Liberty Seguros Insurance policies brochure
21	ANSR Procedure	1204 / 1517	Guidelines for the approval of traffic control and surveillance equipment
24			
25	LEGISLAÇÃO PROTEÇÃO DADOS	2952	Legislation – Decree Law – traffic control and surveillance equipment
26			
27	Anexo Auto avaliação fornecedor condimento farinha – Alergênicos	727	Annex – declaration of allergens
	Questionário Auto-Avaliação 01.14	574	Self-assessment questionnaire
28	JDPDR - Fundo de garantia automóvel	538	Legal letter (translations / witnesses)

MARCH

Date	Name of Document	Words	Description
03	-	-	-
04	-	-	-
05	-	-	-
06	PROCURAÇÃO_BR	590	Power of attorney and authentication (Uganda)
07	PROCURAÇÃO_AE	530	Power of attorney and authentication (Uganda)
10	Alvará 3-2009 Estarreja (Não Perigosos)	1340 / 5877	Full Licence for NH Waste Management Operations
11	Alvará 5-2010 Estarreja (Perigosos)	1367 / 5533	Full Licence for H Waste Management Operations
	Errata Alvará Licença 5_2010 CCDRC	220	Corrections of Licence information
12	Primeiro Averbamento 3-200_SISAV	261	Ammendment No. 1 of Licence
13	Renovação de Alvará	768	Ammendment No. 2 of Licence
14	PS	461	Status report - vehicle insurance
17	Meeting with Personal Tutor	-	-
18	Passaporte 1	270	Legal authentication of photocopies
	Passaporte 2	304	Legal authentication of photocopies
19	20140317184016855	264	Legal authentication of photocopies
20	Declaração	116	Decl. reception of unemployment benefit
	Olá Matt...	89	E-mail da empresa
	Certificação_Bank_Malta	264 / 632	Legal authentication of photocopies
21	20140321162533644	291	Legal authentication of photocopies
	Ementa_Cascas	899	Menu
24	carta	153	Letter requesting financial support (China)
25	NOSSA RESPONSABILIDADE	67	Disclaimer
26	Declaração_AMMPD_BPI_EN	140	General reference (bank)

27	Lisboa Passo a Passo Legendas Castelo + Expo	123 90	Two short paragraphs, presumably for a tourist guide about Lisbon
28	CV XXXXX_EN (<i>Revision</i>) Carta de apresentação (<i>Revision</i>)	385 231	Curriculum Vitae Cover Letter
31	RPreliminar corrigido_1	2250	Insurance claim (construction works for bridge in Brazil)

APRIL

Date	Name of Document	Words	Description
01	Caseinspiritcacau	522	Presentation script
02	ESPECIFICAÇÃO TÉCNICA	1401	Specifications for remote-control robots - deactivating explosive devices
03			
04	FallBack_Mobis_MM_af72	47	Banners (car insurance – discounts etc.)
	FallBack_Mobis_Prestige_af72	45	
07	RP_719751 (Revision)	2744	Status report – Insurance claim
08	Diploma_XXXXX_PT_Rev-Final	569	University transcript (Ukraine)
	Anexo ao Diploma XXXXX_PT_Rev-Final PS_021273848	92	University certificate (Ukraine)
09		670	Insurance claim (settling of building foundations)
	Fatura- AdVerbum	112	Invoice template
10	Molaflex - ACN, Carta XXXXX (Revision)	437	Letter proposing business partnership
	Inspirit	443	Pamphlet (raising awareness of project to build schools in Ivory Coast)
11	-	-	-
14	P ABR – BIO	920	Pedro Abrunhosa biography
	P ABR - SINOPSE	135	Pedro Arbunhosa bio synopsis
15	WeKnowBrussels2014	1053	<i>Eupportunity</i> ; company profile, value/worth
	BP – Texto em Falta	111	Creation of theatre group
16	Ficha técnica	86	Book publication
	Grant Thornton	846	Statutory Auditor's Report
17	Prestador de Serviços – UE Comunicação XXXXX NEG	209	Letter of refusal for qualification recognition
18	Bank holiday	-	-
21	Concurso público -2013-DAC-16 (18-21)	974	Technical specifications for anti-riot helmets and batons (open

22	Cafés	13	competition) Company slogan
23	Certificação – Ordem dos Médicos (RMDS)	224	Certificate of equivalence - UNL
	Certificado	118	Certificate of clinical internships
	UNDL-RMDS	117	Degree Certificate
24	Recompensas	537	Fundraising - paintings, private art lessons
	20140416 Carta para XXXXXX – contribuição definitiva	899	Letter questioning division of profits (pharmaceuticals)
25	National holiday	-	-
28	20140424124437072	774	Legal authentication of photocopies
	TERMO DE GARANTIA	282	Bank guarantee for company
29	Contrato de arrendamento	1389	Fixed-term tenancy agreement
30			

Table 3 - Comprehensive list of translations completed in April 2014

MAY

Date	Name of Document	Words	Description
01	National holiday	-	-
02	Dina Doc	173	Declaration of hospital work performed
05	Meeting with Personal Tutor	-	-
06	Doc 693_tr_1	474	Historical text – Merchants protest; documents sent from India in 1648
	Certidões	240	Certificate for Marriage (Portuguese national marrying abroad)
07	-	-	-
08	Copia do Decifrado da Carta do Vizo rrey da Jndia	465	Letter to King about naval situation in India (1623)
	attachment_cert	450	Degree supplement / Transcript
	attachment_dip	214	Diploma document
09	20140509161828153	228	Legal authentication of photocopies
12	Marca_LicUtiliz Procme Africa_Malta_5maio014_Revisão Preços de Transferência	1730	Licence agreement for the use of Trademarks (African market)
13	Scan_crop	817	Company Newsletter (internationalisation)
	Assento de Nascimento	376	Replacement copy of Birth Certificate
14	Ementa_belem	622	Menu
15	Minolta25020140513135706	1687	Fixed-term tenancy agreement
	Texto	86	Wine production
16	-	-	-

Table 4 - Comprehensive list of translations completed in May 2014

ANNEX IV – TRANSLATION 1: DECREE-LAW No. 207/2005

Line	Original (PT)	Initial Translation (EN)	Revision (EN)
01	MINISTÉRIO DA ADMINISTRAÇÃO INTERNA	MINISTRY OF HOME AFFAIRS	MINISTRY OF HOME AFFAIRS
02	Decreto-Lei n.º 207/2005 de 29 de Novembro	Decree-Law No. 207/2005 of 29 November	Decree-Law No. 207/2005 of 29 November
03	Os sistemas de vigilância electrónica constituem um importante instrumento no quadro das políticas de prevenção e de segurança rodoviárias, bem como na detecção de infrações estradais.	Electronic surveillance systems are an important tool for creating prevention policies, ensuring road safety and registering traffic infractions.	Electronic surveillance systems are an important tool for creating prevention policies, ensuring road safety and registering traffic infractions.
04	As estatísticas relativas ao número de acidentes com vítimas reflectem a situação nacional nesta matéria, com índices relativos superiores à média europeia, apesar da tendência decrescente que se tem verificado.	The statistics relating to the number of accidents with victims are a reflection of the situation in Portugal, which is currently higher than the European average despite the relative decrease in the number of new cases.	The statistics relating to the number of accidents with victims reflect the situation in Portugal, which is currently higher than the European average despite the progressively lower number of new cases.
05	Estes meios constituem não só um meio de dissuasão relevante mas, igualmente, um sistema que permite potenciar a acção das forças de segurança nesta missão essencial para a salvaguarda de pessoas e bens.	As well as acting as a useful deterrent, surveillance systems also help security forces in their vital mission to protect people and goods.	As well as acting as a useful deterrent, surveillance systems also help security forces in their vital mission to protect people and goods.
06	A Lei n.º 39-A/2005, de 29 de Julho, veio introduzir alterações pontuais à lei que regula a utilização de câmaras de vídeo pelas forças e serviços de segurança em locais públicos de utilização comum (Lei n.º 1/2005, de 10 de Janeiro), que mereceram um consenso alargado em sede parlamentar.	Law No. 39-A/2005 of 29 July has introduced specific changes to the law regulating the use of video cameras by security forces and services in public places (Law No. 1/2005 of 10 January) after a broad consensus in the Portuguese Parliament.	Law No. 39-A/2005 of 29 July has introduced specific changes to the law regulating the use of video cameras by security forces and services in public places (Law No. 1/2005 of 10 January) after a broad consensus in the Portuguese Parliament
07	Importa, agora, dar cumprimento à autorização emitida pela citada lei para regular o regime especial, na parte que respeita aos procedimentos na instalação, ao tratamento da informação, ao eficaz registo de acidentes, infracções ou outros ilícitos, bem como à coordenação das forças de segurança e a articulação entre estas e as entidades (Estradas de Portugal, E. P. E., e empresas concessionárias rodoviárias) cujos equipamentos podem ser usados para efeitos das missões de segurança rodoviária agora tornadas possíveis.	It is therefore important to comply with the terms of the above law in order to regulate the special regime, particularly in relation to installation procedures, information processing, the efficient registration of accidents, traffic infractions and other offences, better coordination of security forces and improved cooperation with other entities (Estradas de Portugal (E.P.E) and concessionaires), whose equipment could be used to conduct road safety missions that have now been made possible.	It is therefore important to comply with the terms of the above law in order to regulate the special regime, particularly in relation to installation procedures, information processing, the effective registration of accidents, traffic infractions and other offences, coordination of security forces and improved cooperation with other entities (Estradas de Portugal (E.P.E) and roadway concessionaires), whose equipment could be used to conduct road safety tasks that have now been made possible.
08	Quanto a estas últimas, a Lei n.º 39-A/2005, de 29 de Julho, veio estabelecer uma credencial inequívoca para o pleno uso dos sistemas de registo, gravação e tratamento de dados já existentes ou a instalar,	Law No. 39-A/2005 of 29 July has authorised the full use of existing or new registration, recording and data processing systems to provide security forces with precise information in order to carry out road safety efforts.	Law No. 39-A/2005 of 29 July has authorised the full use of existing or new registration, recording and data processing systems to provide security forces with precise information in order to carry out their specific road safety

	autorizando-o expressamente quando se trate de facultar às forças de segurança informações precisas para a realização das suas missões próprias.		tasks.
09	O processo de preparação do presente decreto-lei veio comprovar que importa completar a clarificação legal já operada, submetendo à Assembleia da República a iniciativa legislativa necessária para que as entidades que adquiriam e pretendem continuar a instalar moderníssimos equipamentos de gestão de tráfego, investindo acertadamente na segurança e prevenção de acidentes, deixem de estar impedidas de utilizar essas tecnologias com máxima eficácia.	Preparation of the present Decree-Law has demonstrated the importance of completing the legal clarification already in operation. The legislative initiative was submitted to the Portuguese Assembly of the Republic to ensure that entities which install the latest traffic surveillance equipment, improving road safety and reducing the number of road accidents, can continue to use the technology freely and to its full potential.	Preparation of the present Decree-Law has demonstrated the importance of completing the legal clarification already carried out. The legislative initiative was submitted to the Portuguese Assembly of the Republic to ensure that entities that acquire and plan to continue installing the latest traffic management equipment, thereby improving road safety and reducing the number of road accidents, can continue to use the technology freely and to its full potential.
10	O Governo empenhar-se-á em que este processo tenha a prioridade e urgência que merece.	The government will make sure that this process is made a top priority and is given the attention it deserves.	The government will make sure that this process is given the priority and urgency it deserves.
11	Foi ouvida a Comissão Nacional de Protecção de Dados.	It was presented to the National Data Protection Commission.	The National Data Protection Commission was consulted about this matter.
12	Assim: No uso da autorização legislativa concedida pelo n.º 2 do artigo 23.º da Lei n.º 39-A/2005, de 29 de Julho, e nos termos da alínea b) do n.º 1 do artigo 198.º da Constituição, o Governo decreta o seguinte:	Therefore: In the exercise of legislative power under article 23 (2) of Law No. 39-A/2005 of 29 July, and in accordance with paragraph b) of article 198 (1) of the Portuguese Constitution, the Government decrees the following:	Therefore: In exercising the legislative power granted by article 23 (2) of Law No. 39-A/2005 of 29 July, and in accordance with paragraph b) of article 198 (1) of the Portuguese Constitution, the Government decrees the following:
13	CAPÍTULO I Objecto e meios de vigilância Artigo 1.º Objecto	CHAPTER I Objective and means of surveillance Article 1 Objective	CHAPTER I Objective and means of surveillance Article 1 Objective
14	O presente decreto-lei visa regular o regime especial autorizado pelo artigo 13.º da Lei n.º 1/2005, de 10 de Janeiro, na redacção decorrente da Lei n.º 39-A/2005, de 29 de Julho, definindo:	The present Decree-Law aims to regulate the special regime authorised under article 13 of Law No. 1/2005 of 10 January, amended under Law No. 39-A/2005 of 29 July, defining:	This Decree-Law aims to regulate the special regime authorised under article 13 of Law No. 1/2005 of 10 January, as amended by Law No. 39-A/2005 of 29 July, defining:
15	a) Os procedimentos a adoptar na instalação, pelas forças de segurança, de sistemas de vigilância electrónica rodoviária;	a) The procedures to be adopted for the installation of electronic traffic surveillance equipment by security forces.	a) The procedures to be adopted for the installation of electronic traffic surveillance equipment by security forces.
16	b) As formas e condições de utilização pelas forças de segurança dos sistemas de vigilância rodo-viária instalados ou a instalar pela Estradas de Portugal, E.P.E., e pelas empresas concessionárias rodoviárias nas respectivas vias concessionadas;	b) The forms and conditions of the use by security forces of electronic traffic surveillance equipment installed, or to be installed, on Portuguese roads by Estradas de Portugal (E.P.E.) and concessionaires on contracted roads.	b) The forms and conditions of use by security forces of electronic traffic surveillance equipment installed, or to be installed, on Portuguese roads by Estradas de Portugal (E.P.E.) and by concessionaires on the respective roads under concession.
17	c) Os procedimentos a adoptar para o tratamento da informação recolhida e o	c) The procedures to be adopted for information processing and efficient registration of accidents,	c) The procedures to be adopted for processing gathered information and for effective

	eficaz registo de acidentes, infracções ou quaisquer ilícitos;	traffic infractions and other offences.	registration of accidents, traffic infractions and other offences.
18	d) As formas através das quais as forças de segurança se coordenam para a eficaz interacção com as empresas, cujos equipamentos estão legalmente autorizadas a utilizar.	d) The ways in which security forces coordinate themselves when interacting with companies whose equipment has been legally authorised to use.	d) The ways in which security forces coordinate their activities to effectively interact with companies whose equipment they have been legally authorised to use.
19	Artigo 2.º Utilização de meios	Article 2 Means	Article 2 Means
20	1 — Com vista à salvaguarda da segurança das pessoas e bens na circulação rodoviária e à melhoria das condições de prevenção e repressão das infracções estradais, as forças de segurança podem recorrer:	1 — With the intention of ensuring the safety of persons and goods in road traffic and improving conditions to help prevent the number of traffic infractions, security forces may use:	1 — To safeguard the safety of persons and goods in road traffic and to improve conditions to help prevent and reduce the number of traffic infractions, security forces may rely on:
21	a) A meios de vigilância electrónica próprios;	a) Personal electronic surveillance equipment.	a) Their own electronic surveillance equipment.
22	b) A sistemas de vigilância rodoviária e de localização instalados ou a instalar pela entidade competente para a gestão das estradas nacionais e pelas concessionárias rodoviárias nas respectivas vias concessionadas.	b) Traffic surveillance and tracking systems installed, or to be installed, by competent entities for the management of Portuguese roads and by concessionaires on contracted roads.	b) Traffic surveillance and tracking systems installed, or to be installed, by the entity competent for managing Portuguese roads and by concessionaires on roads under concession.
23	2 — A cooperação com as entidades referidas na alínea b) do número anterior inclui também o acesso a dados recolhidos através de sistemas de monitorização de tráfego que permitam identificar locais da rede de estradas onde existem práticas de condução em violação de normas legais, bem como a utilização de informações sobre as condições meteorológicas, e de outros dados relevantes para a gestão do tráfego e o cumprimento da legislação rodoviária.	2 — Cooperation between the entities outlined in 1 b) also allows for access to data gathered through traffic monitoring systems in order to identify specific roads with frequent traffic infractions. Information concerning metrological conditions and other data relevant to the managing of traffic and compliance with road legislation may also be used.	2 — Cooperation between the entities outlined in 1 b) also allows for access to data gathered through traffic monitoring systems in order to identify specific roads with frequent traffic infractions. Information concerning weather conditions and other data relevant to traffic management and compliance with road legislation may also be used.
24	3 — Nos termos do n.º 2 do artigo 13.º da Lei n.º 1/2005, de 10 de Janeiro, na redacção dada pela Lei n.º 39-A/2005, de 29 de Julho, o presente regime especial prevalece sobre o regime geral previsto na referida lei.	3 — The present special regime predominates over the general regime under article 13 of Law No. 1/2005 of 10 January, amended under Law No. 39-A/2005 of 29 July.	3 — This special regime prevails over the general regime under article 13 (2) of Law No. 1/2005 of 10 January, as amended by Law No. 39-A/2005 of 29 July.
25	SECÇÃO I Meios próprios Artigo 3.º Meios próprios das forças de segurança	SECTION I Personal equipment Article 3 Personal equipment of security forces	SECTION I Own equipment Article 3 Own equipment of security forces
26	1 — Nos termos do regime especial previsto no artigo 13.º da Lei n.º 1/2005, de 10 de Janeiro, com a redacção decorrente da Lei n.º 39-A/2005, de 29 de Julho, as forças de segurança instalam os meios de	1 — In accordance with the special regime under article 13 of Law No. 39-A/2005 of 10 January, amended under Law No. 39-A/2005 of 29 July, security forces are permitted to install electronic surveillance equipment necessary	1 — In accordance with the special regime under article 13 of Law No. 39-A/2005 of 10 January, as amended by Law No. 39-A/2005 of 29 July, security forces are permitted to install the electronic surveillance equipment necessary

	vigilância electrónica necessários para a prevenção rodoviária e para aplicação das normas respeitantes à circulação de veículos, constantes do Código da Estrada e demais legislação aplicável.	for ensuring road safety, compliance with the Portuguese Highway Code and other applicable legislation.	for ensuring road safety, compliance with the Portuguese Highway Code and other applicable legislation.
27	2 – O planeamento da instalação tem em conta o olume de tráfego nas vias objecto de vigilância, os riscos detectados e as necessidades apuradas de controlo do tráfego.	2 — Installation planning has to take into account the volume of traffic on the roads intended for surveillance as well as the risks and needs for the control of traffic.	2—Installation planning must take into account the volume of traffic on the roads intended for surveillance as well as the risks and needs for the control of traffic.
28	3 — A instalação dos meios de vigilância electrónica bem como a captação de imagens devem ser direccionadas, tanto quanto tecnicamente possível, para os veículos que sejam objecto da acção de prevenção ou de fiscalização.	3 — The installation of electronic surveillance equipment as well as the recording of images must be directed towards vehicles under surveillance or the object of preventative action as much as is technically possible.	3 — The installation of electronic surveillance equipment as well as the recording of images must be directed towards vehicles under surveillance or the object of preventative action as much as is technically possible.
29	4 – Os meios de vigilância, designadamente câmaras digitais, de vídeo ou fotográficas, e sistemas de localização adquiridos pelas forças de segurança para os efeitos previstos no presente decreto-lei constam de inventário próprio e são notificados à Comissão Nacional de Protecção de Dados (CNPd).	4 — The means of surveillance, namely digital video and photographic cameras, and tracking systems acquired by security forces for uses outlined in the present Decree-Law, belong to the security forces and are known to the Portuguese National Data Protection Agency (CNPd).	4 — The means of surveillance, namely digital video and photographic cameras, and tracking systems acquired by security forces for the uses outlined in this Decree-Law, belong to the security forces and are notified to the Portuguese National Data Protection Agency (CNPd).
30	Artigo 4.º Instalação e uso	Article 4 Installation and use	Article 4 Installation and use
31	1 – No âmbito da actividade das forças de segurança de prevenção e detecção de infracções rodoviárias ou de outras desenvolvidas nos termos do número seguinte, são instalados equipamentos de vigilância electrónica ao abrigo do presente regime especial:	1 — In relation to the activity conducted by security forces in the prevention and detection of traffic infractions, or other infractions outlined in the following point, electronic surveillance equipment should be installed under the following special regime:	1 — In relation to the activity conducted by security forces in the prevention and detection of traffic infractions, or other infractions outlined in the following point, electronic surveillance equipment is installed under the following special regime:
32	a) Em veículos; b) Em áreas onde decorram as operações previstas no número seguinte.	a) In vehicles. b) In areas where the operations detailed below take place.	a) In vehicles. b) In areas where the operations detailed below take place.
33	2 — Os equipamentos são usados:	2 — Electronic surveillance equipment is used for:	2 — Electronic surveillance equipment is used for:
34	a) Em acções de prevenção e controlo de tráfego;	a) Preventative actions and traffic control.	a) Preventative actions and traffic control.
35	b) Na detecção, em tempo real ou através de registo, de infracções rodoviárias e na aplicação das correspondentes normas sancionatórias;	b) The detection of traffic infractions, in real-time or as registered footage, and the subsequent application of corresponding penalties.	b) The detection of traffic infractions, in real-time or as registered footage, and the subsequent application of corresponding penalties.
36	c) Em acções de prevenção e socorro em matéria de acidentes de trânsito, sempre que as circunstâncias assim o exijam;	c) Preventative and relief actions in cases of traffic accidents, if the circumstances so require.	c) Preventative and rescue actions in cases of traffic accidents, if the circumstances so require.
37	d) Em operações de	d) Tracking operations of stolen	d) Tracking operations of stolen

	localização de veículos furtados ou detecção de matrículas falsificadas em circulação;	vehicles or the detection of false registration plates in circulation.	vehicles or the detection of false registration plates in circulation.
38	e) Em acções de localização de veículos para efeitos de cumprimento de outras normas legais, designadamente de carácter penal.	e) Tracking operations of vehicles for other legal purposes, namely criminal charges.	e) Tracking operations of vehicles for other legal purposes, namely criminal charges.
39	3 – Os dados obtidos através dos equipamentos de vigilância, em tempo real ou em diferido, podem ser usados, a partir dos respectivos registos, para efeitos de prova em processo penal ou contra-ordenacional, respectivamente nas fases de levantamento de auto, inquérito, instrução e julgamento ou nas fases administrativa e de recurso judicial.	3 — The data obtained through the electronic surveillance equipment, in real-time or as registered footage, can be used respectively as evidence in criminal and misdemeanour litigation, from filing reports, investigations, prosecution and eventual judgements, or in administrative and court proceedings.	3—The data obtained through the electronic surveillance equipment, in real-time or as registered footage, can be used respectively as evidence in criminal or misdemeanour litigation, respectively in the stages of drawing up the official record, inquiry, finding of facts and judgement, or in administrative and appeal stages.
40	Artigo 5.º Dever de notificação	Article 5 Notification requirement	Article 5 Notification requirement
41	1 – As forças de segurança responsáveis pelo tratamento de dados e pela utilização dos meios de vigilância electrónica notificam a CNPD das câmaras fixas instaladas, com identificação do respectivo modelo, características técnicas e número de série e dos locais públicos que estas permitem observar, bem como do nome da entidade responsável pelo equipamento e pelos tratamentos de dados.	1 — Security forces responsible for data processing and the use of electronic surveillance equipment must notify the CNPD of the location of fixed installations, along with identification of the respective models, technical features, serial numbers, public places which can be observed, as well as the name of the entity responsible for the equipment and the processing of data.	1 — Security forces responsible for data processing and the use of electronic surveillance equipment must notify the CNPD of the location of fixed cameras, along with identification of the respective models, technical features, serial numbers, public places which can be observed by them, as well as the name of the entity responsible for the equipment and the processing of data.
42	2 – São igualmente notificados os meios portáteis disponíveis, com identificação do respectivo modelo, características técnicas e número de série.	2 — The CNPD must also be notified of all portable devices available, along with identification of the respective model, technical features and serial number.	2 — The CNPD must also be notified of all portable devices available, along with identification of the respective model, technical features and serial number.
43	SECÇÃO II Meios instalados por outras entidades Artigo 6.º Utilização de meios e dever de gravação	SECTION II Equipment installed by other entities Article 6 Use of equipment and recording requirements	SECTION II Equipment installed by other entities Article 6 Use of equipment and recording requirements
44	1 — Nos termos do artigo 13.º da Lei n.º 1/2005, de 10 de Janeiro, na redacção decorrente da Lei n.º 39-A/2005, de 29 de Julho, a empresa Estradas de Portugal, E.P.E., e as empresas concessionárias rodoviárias, nas respectivas vias concessionadas:	1 — In accordance with article 13 of Law No. 1/2005 of 10 January, amended under Law No. 39-A/2005 of 29 Julho, Estradas de Portugal (E.P.E.) and concessionaires concerning the respective contracted roads, should:	1 — In accordance with article 13 of Law No. 1/2005 of 10 January, as amended by Law No. 39-A/2005 of 29 July, Estradas de Portugal (E.P.E.) and concessionaires concerning the respective contracted roads, should:
45	a) Facultam as forças de segurança acesso directo às instalações dos centros de controlo de tráfego que se encontrem em serviço ou venham a existir nas respectivas áreas de responsabilidade;	a) Grant security forces direct access to installations in traffic control centres which are located in the area under surveillance.	a) Grant security forces direct access to installations in traffic control centres which are operating or come to exist in the area under surveillance.

46	b) Procedem, para os efeitos especificamente autorizados pelo n.º 2 do artigo 13.º da Lei n.º 1/2005, de 10 de Janeiro, a todas as gravações de imagens e registos de dados necessários para a realização dos fins previstos no preceito referido e nos respectivos contratos de concessão.	b) Process all image recordings and registered data necessary for operations authorised under article 13 (2) of Law No. 1/2005 of 10 January and in the respective concession contracts.	b) Process all image recordings and registered data necessary for operations authorised under article 13 (2) of Law No. 1/2005 of 10 January and in the respective concession contracts.
47	2 — As imagens registadas são complementadas pelos elementos de informação registados, designadamente o local, a data, a hora e o tipo de ocorrência.	2 — The recordings should feature complementary information, namely the location, date, time and type of occurrence.	2 — Recorded images should feature complementary recorded information, namely the location, date, time, and type of occurrence.
48	Artigo 7.º Acesso pelas forças de segurança	Article 7 Access by security forces	Article 7 Access by security forces
49	1 — As forças de segurança acedem em tempo real aos dados captados pelos sistemas de vigilância electrónica das entidades referidas no artigo anterior através de elementos de ligação presentes nas salas de controlo e outras instalações disponíveis.	1 — Security forces can have real-time access to data captured by electronic surveillance systems of the previously mentioned entities using the connection in the control rooms and other available installations.	1 — Security forces can have real-time access to data captured by electronic surveillance systems of the previously mentioned entities using the means of connection in the control rooms and other available installations.
50	2 — As forças de segurança podem ainda aceder aos dados captados pelos sistemas referidos através de consulta dos respectivos arquivos, decorrentes do registo, gravação e tratamento de dados autorizados pelo n.º 2 do artigo 13.º da Lei n.º 1/2005, de 10 de Janeiro, utilizando para o efeito os sistemas de informação mantidos e geridos pelas empresas que, para o efeito, adoptarão as providências necessárias e adequadas.	2 — Security forces can also use information systems maintained by other entities to gain access to data captured by the aforementioned electronic surveillance systems in order to consult archives, recordings and processed data as authorised under article 13 (2) of Law No. 1/2005 of 10 January. The entities will take the appropriate steps to facilitate this process.	2 — Security forces can also use information systems maintained by other companies to gain access to data captured by the aforementioned electronic surveillance systems in order to consult archives, recordings and processed data as authorised under article 13 (2) of Law No. 1/2005 of 10 January. The said companies will take the necessary and appropriate steps to facilitate this process.
51	3 — Os elementos de ligação e os responsáveis pelo acesso em diferido são agentes ou militares das forças de segurança, devidamente credenciados pelas direcções e comandos respectivos.	3 — Specially qualified security force agents or military personnel will be responsible for connections and deferred access.	3 — Specially qualified security force agents or military personnel will be responsible for connections and deferred access.
52	Artigo 8.º Utilização dos dados	Article 8 Use of data	Article 8 Use of data
53	A verificação de ocorrências pelos agentes ou militares das forças de segurança, devidamente credenciados, obedece às mesmas regras da observação directa e tem o mesmo valor probatório.	Any verification of an occurrence made by qualified security force agents or military personnel must follow the same direct observation rules and have the same evidential value.	Any verification of an occurrence made by qualified security force agents or military personnel must follow the same direct observation rules and have the same evidential value.
54	Artigo 9.º Procedimentos no registo e tramitação	Article 9 Registration and processing procedure	Article 9 Registration and procedures

55	<p>Detectada alguma das situações previstas no artigo 13.º da Lei n.º 1/2005, de 10 de Janeiro, e para as finalidades nele previstas, o elemento de ligação, consoante os casos:</p>	<p>Should any of the situations in article 13 of Law No. 1/2005 of 10 January arise, connection can be established in order to:</p>	<p>Should any of the situations in article 13 of Law No. 1/2005 of 10 January arise, connection can be established in order to:</p>
56	<p>a) Comunica a situação à força de segurança ou às entidades de emergência, com vista ao accionamento das operações adequadas;</p>	<p>a) Explain the occurrence to the security forces of emergency services who can adequately deal with the situation.</p>	<p>a) Explain the occurrence to the security forces or emergency services who can adequately deal with the situation.</p>
57	<p>b) Informa a força de segurança competente da localização da viatura ou outra informação pertinente, nos termos da alínea c) do n.º 2 do artigo 4.º;</p>	<p>b) Inform the respective security force of the location of the vehicle or other relevant information, in accordance with paragraph c) of article 4 (2).</p>	<p>b) Inform the respective security force of the location of the vehicle or other relevant information, in accordance with paragraph c) of article 4 (2).</p>
58	<p>c) Comunica à força de segurança competente, directamente, ou à autoridade judiciária, através do comando, e com base no pedido por estas efectuado, a localização do veículo, bem como os elementos registados pertinentes para o processo em causa;</p>	<p>c) Explain the location of the vehicle as well as other relevant registered information to the respective security force directly, or to the judicial authority through the command centre.</p>	<p>c) Explain the location of the vehicle as well as other relevant registered information to the respective security force directly, or to the judicial authority through the command centre.</p>
59	<p>d) Levanta auto de notícia, com a descrição da infracção, a que junta menção do registo efectuado.</p>	<p>d) Draw up a notice with a description of the interaction and registration.</p>	<p>d) Draw up a notice with a description of the interaction and registration.</p>
60	<p>CAPÍTULO II Tratamento de dados</p> <p>SECÇÃO I Finalidade e regime geral</p> <p>Artigo 10.º Finalidades autorizadas</p>	<p>CHAPTER II Data processing</p> <p>SECTION I Purpose and general regime</p> <p>Article 10 Authorised purposes</p>	<p>CHAPTER II Data processing</p> <p>SECTION I Purpose and general regime</p> <p>Article 10 Authorised purposes</p>
61	<p>Nos termos do n.º 2 do artigo 13.º da Lei n.º 1/2005, de 10 de Janeiro, os registos, a gravação e o tratamento de dados pessoais têm lugar, apenas, para as seguintes finalidades, específicas e determinadas:</p>	<p>In accordance with article 13 (2) of Law No. 1/2005 of 10 January, the registering, recording and processing of personal data should only be used for:</p>	<p>In accordance with article 13 (2) of Law No. 1/2005 of 10 January, the registering, recording and processing of personal data should only be used for the following specific and determined purposes:</p>
62	<p>a) Detecção de infracções rodoviárias e aplicação das correspondentes normas estradais;</p>	<p>a) Detection of traffic infractions and the application of corresponding penalties.</p>	<p>a) Detection of traffic infractions and the application of corresponding penalties.</p>
63	<p>b) Controlo de tráfego, prevenção e socorro em caso de acidente;</p>	<p>b) Traffic control as well as preventative and relief actions in emergency cases.</p>	<p>b) Traffic control as well as preventative and rescue actions in emergency cases.</p>
64	<p>c) Localização de viaturas furtadas ou procuradas pelas autoridades judiciais ou policiais para efeitos de cumprimento de normas legais, designadamente de carácter penal, bem como a detecção de matrículas falsa em circulação;</p>	<p>c) Tracking stolen or missing vehicles for the judicial or police authorities for legal purposes, namely criminal charges, as well as the detection of false registration plates in circulation.</p>	<p>c) Tracking of stolen or missing vehicles for the judicial or police authorities for legal purposes, namely criminal charges, as well as the detection of false registration plates in circulation.</p>
65	<p>d) Prova em processo penal ou</p>	<p>d) Evidence in criminal and</p>	<p>d) Evidence in criminal and</p>

	contra-ordenacional nas diferentes fases processuais.	misdeemeanour litigation in the different stages of court proceedings.	misdeemeanour litigation in the different stages of court proceedings.
66	Artigo 11.º Regras aplicáveis	Article 11 Applicable rules	Article 11 Applicable rules
67	1 – Os sistemas de registo, gravação e tratamento de dados regulados pelo presente decreto-lei são apenas utilizáveis de acordo com as regras previstas no artigo 8.º, bem como nos n.ºs 1 e 2 do artigo 9.º e no artigo 11.º da Lei n.º 1/2005, de 10 de Janeiro, e em conformidade com os princípios gerais de tratamento de dados pessoais previstos na Lei n.º 67/98, de 26 de Outubro, em especial os princípios da adequação e da proporcionalidade.	1 — The registration, recording and data processing systems regulated by the present Decree-Law can only be used in accordance with the rules stipulated under articles 8, 9 (1)(2) and 11 of Law No. 1/2005 of 10 January, and in compliance with the general principles of the processing of personal data under Law No. 67/98 of 26 October, in particular, those concerning appropriateness and proportionality.	1 — The registration, recording and data processing systems regulated by this Decree-Law can only be used in accordance with the rules stipulated under articles 8, 9 (1)(2) and 11 of Law No. 1/2005 of 10 January, and in compliance with the general principles of the processing of personal data under Law No. 67/98 of 26 October, in particular, those concerning appropriateness and proportionality.
68	2 – Os procedimentos relativos à comunicação à autoridade judiciária, quando haja registo com relevância criminal, asseguram que esta se faça no prazo legal, devendo o auto, levantado nos termos gerais, ser acompanhado das gravações disponíveis que se mostrem relevantes.	2 — Communication with judicial authorities concerning a case of criminal relevance should be established within the legal deadline. The notification should be presented with any relevant recordings.	2 — Procedures of communication with judicial authorities concerning a case of criminal relevance should be established within the legal deadline. The notification should be presented with any relevant recordings.
69	3 – Para control dos procedimentos e segurança da informação comunicada e protecção da confidencialidade dos dados, são adoptadas as medidas previstas no artigo 17.º	3 — The measures under article 17 should be adopted for the monitoring of procedures and the protection of data and communicated information.	3 — The measures under article 17 should be adopted for the monitoring of procedures and the protection of data and communicated information.
70	4 – A CNPD tem acesso aos dados de que constem a data, a hora e o local das ocorrências, os números de registo, as normas violadas, a entidade e pessoa que efectuou o registo e o comunicou, a entidade a quem foi comunicada, o meio utilizado para a comunicação e a data da recepção pela autoridade competente.	4 — CNPD has access to data including the date, time and location of occurrences, document registration numbers, rules broken, the entity and the person who made and communicated the registration, the entity which received the registration, the method by which it was communicated and the reception date by the respective entity.	4 — CNPD has access to data including the date, time and location of occurrences, registration numbers, rules broken, the entity and the person who made and communicated the registration, the communication recipient entity, the method by which it was communicated and the reception date by the respective authority.
71	Artigo 12.º Limites à captação, gravação e tratamento	Article 12 Capturing, recording and processing restrictions	Article 12 Capturing, recording and processing restrictions
72	1 – A captação, registo e tratamento de imagens e sons, previstas nos artigos anteriores, devem corresponder estritamente ao tipo de acção desenvolvida e à finalidade a que se destina ou, quando captadas em sistemas de entidades terceiras, obedecer em todo o processo de utilização aos limites decorrentes da definição legal dos usos autorizados.	1 — The capturing, recording and processing of images and sounds, in accordance with previous articles, should strictly comply to the type of action performed and the use it was intended for. When captured by third party entities, the legal definition of authorised use should be strictly adhered to.	1 — The capturing, recording and processing of images and sounds, in accordance with previous articles, should strictly comply to the type of action performed and the use it was intended for. Images and sounds captured by systems of third-party entities must comply with the legally defined authorised uses applicable to the whole utilisation process.
73	2 – As forças de segurança adoptam as providências necessárias à eliminação dos registos ou os dados pessoais destes constantes, desde que	2 — Security forces should adopt the necessary measures regarding the elimination of reports and personal data collected for authorised purposes if it is	2 — Security forces should adopt the necessary measures regarding the elimination of reports and personal data collected for authorised purposes if it is

	identificados ou identificáveis, recolhidos no âmbito das finalidades autorizadas que se revelem excessivos ou desnecessários para a prossecução dos procedimentos penais ou contra-ordenacionais.	revealed to be excessive or irrelevant to the prosecution of legal and misdemeanour litigation.	revealed to be excessive or irrelevant to the prosecution of legal and misdemeanour litigation.
74	3 – O acesso das das forças de segurança a dados relativos a veículos constantes de sistemas de informação de circulação assentes no uso de identificadores contratualizados com os utentes no âmbito da Via Verde faz-se nos termos da lei processual penal e das demais disposições legais aplicáveis.	3 — Access of security forces to vehicle data registered in traffic information systems containing personal data of motorists with Via Verde contracts is legally applicable in accordance with criminal procedure and legal litigation.	3 — Access by security forces to vehicle data registered in traffic information systems containing personal data of motorists with Via Verde contracts is legally applicable in accordance with criminal procedure and legal litigation.
75	Artigo 13.º Dados objecto de tratamento	Article 13 Data to be processed	Article 13 Data to be processed
76	1 — O registo efectuado, além da imagem, inclui os seguintes dados: a) Local, data e hora do registo; b) Dados que ajudem a comprovar a infracção; c) Tipo de infracção e normas da legislação estradal ou outra que se consideram violadas; d) Identificação do agente ou elemento de ligação responsável que efectuou a observação.	1 — Beyond the video, the following information should also be included: a) Location, date and time. b) Supporting evidence of the infraction. c) Type of infraction and a list of the rules of the Highway Code that are considered to have been broken. d) Identification of the agent or responsible connection who made the observation.	1 — Beyond the video, the following information should also be included: a) Location, date and time. b) Supporting evidence of the infraction. c) Type of infraction and a list of the rules of the Highway Code that are considered to have been broken. d) Identification of the agent or liaison who made the observation.
77	2 – Nos casos previstos na alínea c) do n.º 2 do artigo 4.º e na alínea b) do artigo 10.º, podem ser registados outros dados pessoais para efeitos de socorro e emergência, apenas, para tal finalidade.	2 — In relation to cases outlined in paragraph c) of article 4 (2) and paragraph b) of article 10, other personal data may be registered but it will only be used for relief and emergency situations.	2 — In relation to cases outlined in paragraph c) of article 4 (2) and paragraph b) of article 10, other personal data may be registered but it will only be used for rescue and emergency situations
78	SECÇÃO II Comunicação e conservação Artigo 14.º Comunicação dos dados	SECTION II Communication and conservation Article 14 Communication of data	SECTION II Communication and conservation Article 14 Communication of data
79	1 — Os dados registados podem ser comunicados: a) Às forças de segurança, no que respeita às competências que legalmente lhes estão fixadas;	1 — Registered data can be communicated to: a) Security forces as regards to the powers vested in them.	1 — Registered data can be communicated to: a) Security forces as regards to the powers vested in them.
80	b) Às autoridades judiciárias, em particular ao Ministério Público, para efeitos de procedimento criminal, quando tal resulte de obrigação legal ou a solicitação destas, se for o caso;	b) Judicial authorities, in particular to the Portuguese Public Ministry, in criminal procedures when legally required, if such is the case.	b) Judicial authorities, in particular to the Portuguese Public Ministry, in criminal procedures when legally required, if such is the case.
81	c) A Direcção-Geral de Viação para efeitos das competências previstas no Código da Estrada e	c) National Road-Safety Authority (CNPD) as regards to the powers vested in them outlined in the Portuguese Highway Code and	c) National Road-Safety Authority (CNPD) as regards to the powers vested in them outlined in the Portuguese Highway Code and

	legislação complementar;	complementary legislation.	complementary legislation.
82	d) Às entidades de emergência e socorro, quanto aos dados pertinentes, com vista à sua célere actuação.	d) Relief and Emergency services for quick response to calls.	d) Rescue and Emergency services for quick response to calls.
83	2 — Às entidades referidas no n.º 1 são apenas comunicados, por via informática ou outra, os dados estritamente necessários para assegurar o cumprimento das respectivas obrigações legais.	2 — Only strictly necessary data will be communicated to the entities referred to in the previous provision in order to ensure compliance of respective legal obligations.	2 — Only strictly necessary data will be communicated, by computer or other means, to the entities referred to in the previous provision in order to ensure compliance with the respective legal obligations.
84	3 — Os dados podem ser comunicados por via electrónica ou em suporte físico, desde que sejam cumpridos os requisitos de segurança referidos do artigo 17.º	3 — Data can be communicated either electronically or in a hard-copy format, provided that the security requirements referred to in article 17 have been met.	3 — Data can be communicated either electronically or in a hard-copy format, provided that the security requirements referred to in article 17 have been met.
85	4 — Os meios de comunicação utilizados devem assegurar a privacidade e autenticidade da informação transmitida, a par da celeridade e eficácia do procedimento.	4 — The means of communication used must ensure the privacy and authenticity of information transmitted for a quicker and more efficient procedure.	4 — The means of communication used must ensure the privacy and authenticity of information transmitted for a quicker and more efficient procedure.
86	5 — É assegurado o acesso da CNPD às comunicações efectuadas no âmbito do presente decreto-lei, bem como aos sistemas utilizados, salvaguardando-se sempre o sigilo dos dados e, nos casos aplicáveis, o segredo de justiça.	5 — CNPD is allowed access to communicated data, in accordance with the present Decree-Law, as well as systems used, always making sure to protect the privacy of data and confidentiality of investigations (if applicable).	5 — CNPD is allowed access to communicated data, in accordance with this Decree-Law, as well as to the systems always making sure to protect the privacy of data and, when applicable, confidentiality of investigations.
87	Artigo 15.º Conservação dos dados	Article 15 Data conversion	Article 15 Data conversion
88	1 — os dados gravados e os elementos probatórios acompanham os respectivos autos e processos e são conservados, nos termos do número seguinte, durante o período estritamente necessário para o fim a que se destinam.	1 — Recorded data and documentary evidence should be produced for the respective notifications and processes. They are only conserved for their intended purpose in accordance with the following provision.	1 — Recorded data and documentary evidence are attached to the respective notifications and processes and, according to the following provision, shall be conserved during the strictly necessary period for their intended purpose.
89	2 — A apreciação relativa à conservação dos dados deve considerar: a) A conclusão de uma investigação sobre um caso específico; b) Uma decisão administrativa ou judicial definitiva, em especial de arquivamento ou absolvição; c) A prescrição do procedimento contra-ordenacional ou criminal; d) A reabilitação; e) O cumprimento da pena, obrigação ou coima por parte do infractor; f) As amnistias.	2 — The following points must be taken into consideration concerning the conservation of data: a) Conclusion of an investigation about a specific case. b) Administrative or definitive judicial decision, particularly concerning filing or acquittal. c) Limitation of criminal and misdemeanour litigation. d) Rehabilitation e) The paying of a fine or penalty by the offender. f) Pardons	2 — The following points must be taken into consideration concerning the conservation of data: a) Conclusion of an investigation about a specific case. b) Administrative or definitive judicial decision, particularly concerning dismissal or acquittal. c) Limitation of criminal and misdemeanour litigation. d) Rehabilitation e) Fulfilment of the punishment, obligation or fine by the offender.
90	CAPÍTULO III Transparência e segurança Artigo 16.º	CHAPTER III Transparency and certainty Article 16	CHAPTER III Transparency and security Article 16

	Informação dos locais	Location data	Location data
91	1 – Para efeitos de aplicação do presente decreto-lei, as estradas e outros locais onde estejam ou venham a ser instalados meios de vigilância electrónica fixos por parte de forças de segurança são assinalados com a informação, apenas da sua existência.	1 — In accordance with the present Decree-Law, the existence of fixed electronic surveillance equipment installed by security forces on roads or other locations, should be made known.	1 — In accordance with this Decree-Law, the existence of fixed electronic surveillance equipment installed by security forces on roads or other locations, should be made known.
92	2 — As forças de segurança prestam, através da comunicação social e por outros meios, informação regular sobre a utilização de meios de vigilância electrónica em operações de controlo de tráfego.	2 — Security forces should regularly provide information about the use of electronic surveillance equipment for traffic control through social communication or other means.	2 — Security forces must regularly provide information about the use of electronic surveillance equipment for traffic control through social communication or other means.
93	Artigo 17.º Segurança e controlo da informação	Article 17 Certainty and control of information	Article 17 Security and Information control
94	Sem prejuízo do disposto na legislação aplicável, são objecto de controlo, tendo em vista a segurança da informação:	Without prejudice of the applicable legislation, the following points concerning the protection of data are under constant control:	Without prejudice of the applicable legislation, the following points concerning the protection of data are under constant control:
95	a) Os suportes de dados e os meios de comunicação e transporte, a fim de impedir que possam ser lidos, copiados, alterados ou eliminados por qualquer pessoa ou por qualquer forma não autorizadas;	a) The data medium and the means of communication and transport so as to prevent the data from being read, copied, altered or eliminated by any unauthorised means.	a) The data medium and the means of communication and transport so as to prevent the data from being read, copied, altered or eliminated by any person or by any unauthorised means.
96	b) A manipulação de dados, a fim de impedir a inserção, bem como qualquer tomada de conhecimento, alteração ou eliminação, não autorizada, de dados pessoais;	b) The manipulation of data so as to prevent insertions, as well as any unauthorised reading, alteration or elimination of personal data.	b) The manipulation of data so as to prevent insertions, as well as any unauthorised reading, alteration or elimination of personal data.
97	c) Os sistemas de tratamento automatizado de dados, para impedir que possam ser utilizados por pessoas não autorizadas;	c) Automatic data processors so as to prevent their misuse by unauthorised persons.	c) Automatic data processors so as to prevent their misuse by unauthorised persons.
98	d) O acesso aos dados, para que as pessoas autorizadas só possam ter acesso aos dados que interessem ao exercício das suas atribuições legais;	d) Access to data so as to ensure only authorised persons may use data relevant for carrying out legal tasks.	d) Access to data so as to ensure only authorised persons may use data relevant for carrying out legal tasks.
99	e) A transmissão de dados, para garantir que a sua utilização seja limitada a quem está para tal autorizado;	e) The transmission of data so as to ensure that only authorised persons may use it.	e) The transmission of data so as to ensure that only authorised persons may use it.
100	f) A inserção, a alteração e a eliminação de dados, de forma a verificar-se por quem, como e quando foram inseridos.	f) The insertion, alteration and elimination of data so as to verify by whom, how and when the modifications were made.	f) The insertion, alteration and elimination of data so as to verify by whom, how and when the modifications were made.
101	Artigo 18.º Informação para fins	Article 18 Information for statistical and educational purposes	Article 18 Information for statistical and educational purposes

	estatísticos e didáticos		
102	A informação que seja objecto de tratamento no âmbito do presente decreto-lei pode ser divulgada para fins estatísticos ou didáticos desde que, observadas as disposições legais aplicáveis, resultem inidentificáveis as pessoas e os veículos a que respeita.	Information recorded resulting from the terms of the present Decree-Law may be disclosed for statistical and educational purposes as long as the respective individuals and vehicles remain anonymous within the legal framework.	Information processed within the scope of this Decree-Law may be disclosed for statistical and educational purposes as long as the respective individuals and vehicles remain anonymous within the legal framework.
103	CAPÍTULO IV Coordenação das forças de segurança Artigo 19.º Coordenação das forças de segurança	CHAPTER IV Coordination of security forces Article 19 Coordination of security forces	CHAPTER IV Coordination of security forces Article 19 Coordination of security forces
104	As forças de segurança, no âmbito das competências legais respectivas, coordenam e programam as acções e as operações previstas no âmbito do presente decreto-lei, entre si, e com as entidades envolvidas na recolha e tratamento da informação e nos procedimentos delas resultantes.	Within the scope of their legal competences, the coordination and programming of actions and operations outlined in the present Decree-Law are the responsibility of security forces, as well as other entities concerning the collection and processing of information and the resulting procedures.	Within the scope of their legal competences, the coordination and programming of actions and operations outlined in this Decree-Law are the responsibility of security forces, as well as other entities concerning the collection and processing of information and the resulting procedures.
105	Artigo 20.º Formas de cooperação	Article 20 Forms of cooperation	Article 20 Forms of cooperation
106	1 – As forças de segurança, no âmbito do presente decreto-lei, cooperam com a empresa Estradas de Portugal E.P.E, e com as empresas concessionárias, na qualidade de entidades responsáveis pela operação dos sistemas de vigilância das condições de circulação rodoviária de que são proprietárias, ajustando com estas entidades as condições de acesso dos elementos de ligação e a utilização das instalações e dos equipamentos, que não pode prejudicar a sua regular gestão e funcionamento.	1 — In relation to the present Decree-Law, security forces should cooperate with the company Estradas de Portugal (E.P.E.) and other concessionaires, to ensure the quality of the entities responsible for the electronic surveillance systems of road traffic under their control. They should negotiate the conditions of access to connections and the use of installations and equipment with these entities so as not to impair their operation and management.	1 — In relation to this Decree-Law, security forces should cooperate with the company Estradas de Portugal (E.P.E.) and with the concessionaires acting as the entities responsible for the operation of electronic systems that monitor road traffic conditions under their control. The security forces must negotiate the conditions of access to connection elements and the use of installations and equipment with these entities so as not to impair their operation and management.
107	2 – Quando, para arquivamento de registos legalmente autorizados, utilizem suportes físicos cedidos pelas empresas titulares dos sistemas de vigilância eletrónica, as forças de segurança pagam os montantes correspondentes ao respectivo custo, nos termos e em condições resultantes de acordo com as empresas.	2 — Concerning the legally authorised filing of records, security forces will agree a sum to be paid to the owners of the electronic surveillance systems for any hard copies produced.	2 — Concerning the filing of legally authorised records, security forces will agree to pay an amount corresponding to the respective cost to the owners of the electronic surveillance systems for any hard copies produced.
108	Visto e aprovado em Conselho de Ministros de 29 de Setembro de 2005. — José Sócrates Carvalho Pinto de Sousa — António Luís Santos Costa — Alberto Bernardes Costa — Mário Lino Soares Correia.	Heard and approved in the Portuguese Council of Ministers on 29 September 2005. — José Sócrates Carvalho Pinto de Sousa — António Luís Santos Costa — Alberto Bernardes Costa — Mário Lino Soares Correia.	Heard and approved in the Portuguese Council of Ministers on 29 September 2005. — José Sócrates Carvalho Pinto de Sousa — António Luís Santos Costa — Alberto Bernardes Costa — Mário Lino Soares Correia

109	Promulgado em 4 de Novembro de 2005. Publique-se. O Presidente da República, JORGE SAMPAIO.	Enacted on 4 November 2005. Published. The President of the Republic, JORGE SAMPAIO.	Enacted on 4 November 2005. Published. The President of the Republic, JORGE SAMPAIO.
110	Referendado em 16 de Novembro de 2005. O Primeiro-Ministro, José Socrates Carvalho Pinto de Sousa.	Authorised on 16 November 2005. The Prime Minister, José Socrates Carvalho Pinto de Sousa.	Authorised on 16 November 2005. The Prime Minister, José Socrates Carvalho Pinto de Sousa.

ANNEX V – SPECIFICATIONS FOR ROBOTS – DEACTIVATING ROBOTS

SECTION 1

Original (PT)	Initial Translation (EN)	Revision (EN)
<p>OBJETO A presente Especificação Técnica (ET) é para um(a): VEÍCULO DE CONTROLO REMOTO LIGIEIRO PARA RECONHECIMENTO E INSPEÇÃO DE ENGENHOS EXPLOSIVOS, TRANSPORTÁVEL MANUALMENTE POR APENAS 01 OPERADOR, COM CANHÃO DISRUPTOR ACOPLÁVEL</p>	<p>OBJECT This Technical Specification (TS) is for: A LIGHT REMOTE-CONTROLLED VEHICLE FOR THE RECOGNITION AND INSPECTION OF EXPLOSIVE DEVICES, MANUALLY TRANSPORTABLE BY JUST ONE OPERATOR, WITH AN ATTACHABLE DISARMING DEVICE.</p>	<p>OBJECT This Technical Specification (TS) is for: A LIGHT REMOTE-CONTROLLED VEHICLE FOR THE RECOGNITION AND INSPECTION OF EXPLOSIVE DEVICES, MANUALLY TRANSPORTABLE BY JUST ONE PERSON, WITH AN ATTACHABLE DISARMING DEVICE.</p>
<p>1. GENERALIDADES As características técnicas dos materiais a adquirir têm que obedecer aos Requisitos Essenciais. XXXXX</p>	<p>1. GENERAL INSTRUCTIONS The technical characteristics of the materials to be acquired have to meet the following Essential Requirements. XXXXX</p>	<p>1. GENERAL INSTRUCTIONS The technical characteristics of the materials to be acquired must meet the following Essential Requirements. XXXXX</p>
<p>2. DESCRIÇÃO E UTILIZAÇÃO DO OBJECTO</p> <p>a. O veículo de controle remoto (VCR) ligeiro de reconhecimento e inativação de engenhos explosivos permite formação e treino, particularmente na área XXXXX, nas ações de condução, manipulação, utilização de equipamento (armas e outras ferramentas) e manutenção, na realização de tarefas de reconhecimento e inativação de engenhos explosivos</p> <p>b. A área de aplicação é reconhecimento e vigilância no campo de batalha em zonas urbanas e inativação de engenhos explosivos, com a potencialidade de ser projetável em viatura táctica ligeira e transportável manualmente por apenas 01 (um) operador. XXXXX</p> <p>c. O Veículo de Controlo Remoto ligeiro é constituído por:</p> <ol style="list-style-type: none"> 1. Sistema de mobilidade de construção modular, reconfigurável e de fácil acoplagem de acessórios e componentes, com capacidade de alterar o seu sistema de rodagem; 2. Braço manipulador com garra; 3. Caixa rígida para transporte e armazenamento; 4. Mochila táctica de transporte acondicionado do VCR; 5. Canhão disruptor (com cartuchos) acoplável no braço manipulador do VCR. 	<p>2. DESCRIPTION AND USE OF THE OBJECT</p> <p>a. The light Remote-Controlled Vehicle (RCV) which recognises and deactivates explosive devices allows for training, particularly in the area of XXXXX, for actions including driving, manipulation, use of the equipment (arms and other tools) and maintenance, while conducting recognition and deactivation tasks of explosive devices.</p> <p>b. The RCV is to be used in the areas of recognition, surveillance in battlefields and urban areas, and deactivation of explosive devices, with the potential to be designed as a tactical light vehicle and to be manually transported by just one operator. XXXXX</p> <p>c. The light Remote-Controlled Vehicle is made up of:</p> <ol style="list-style-type: none"> 1. Modular mobility system which can be reconfigured, have accessories and components easily attached and with the capacity to have its rolling system altered 2. Robot arm with claw 3. Sturdy container for transportation and storage 4. Tactical bag for storage during transportation of the RCV 5. Attachable disarming device (with cartridges) on the robot arm of the RCV. 	<p>2. DESCRIPTION AND USE OF THE OBJECT</p> <p>a. The light Remote-Controlled Vehicle (RCV) which recognises and deactivates explosive devices allows for training, particularly in the area of XXXXX, for actions including driving, manipulation, use of the equipment (arms and other tools) and maintenance, while conducting recognition and deactivation tasks of explosive devices.</p> <p>b. The RCV is to be used in the areas of recognition, surveillance in urban battleground areas, and deactivation of explosive devices, with the potential to be designed as a tactical light vehicle and to be manually transported by just one operator. XXXXX</p> <p>c. The light Remote-Controlled Vehicle is made up of:</p> <ol style="list-style-type: none"> 1. Modular mobility system which can be reconfigured, have accessories and components easily attached and with the capacity to have its rolling system altered 2. Robot arm with claw 3. Rigid container for transportation and storage 4. Tactical bag for storage during transportation of the RCV 5. Attachable disarming device (with cartridges) on the robot arm of the RCV.

SECTION 2

Original (PT)	Initial Translation (EN)	Revision (EN)
<p>3. REQUISITOS ESSENCIAIS (numerados de [1] a [11])</p> <p>a) MOBILIDADE [1]</p> <ol style="list-style-type: none"> 1. Possibilidade de ser configurado para operar com rodas e lagartas; 2. Possibilidade de atingir velocidades superiores a 6 km/h; 3. Possibilidade de subir escadas; 4. Possibilidade de ser transportado manualmente por um só operador; 5. Autonomia de 3 a 4 horas em operação corrente <p>b) PESO [2]</p> <p>c) Até 10 kg com sistema de mobilidade;</p> <p>d) Até 30 kg com equipamento acoplado;</p> <p>e) Transportado manualmente por um só operador.</p> <p>c) DIMENSÕES [3]</p> <ol style="list-style-type: none"> 1. Pequeno, com capacidade de entrar em tuneis e locais exíguos; 2. Dimensões do sistema de mobilidade da ordem de grandeza de (comprimento x largura x altura) 60cm x 40cm x 20cm. <p>d) RESISTÊNCIA [4]</p> <ol style="list-style-type: none"> 1. Capacidade de resistência de choque no sistema de mobilidade, que permita continuar a operar mesmo após ser derrubado; 2. Capacidade para operar em quaisquer condições climáticas. <p>e) VIDEO, AUDIO E ILUMINAÇÃO [5]</p> <ol style="list-style-type: none"> 1. Possuir câmaras a cores (frontal, traseiro e laterais), com imagem estabilizada, incluindo câmara com rotação de pelo menos 200°; 2. Microfone incorporado e capacidade de comunicação em dois sentidos; 3. Luzes de trabalho incorporadas com regulação de intensidade; 4. Possibilidade de ligação a monitores externos. <p>f) CONSOLA [6]</p> <ol style="list-style-type: none"> 1. Portátil, com sistema de visualização das câmaras; 2. Interoperável com outros veículos de controlo remoto da mesma família; 3. XXXXX <p>g) MANIPULADOR [7]</p> <ol style="list-style-type: none"> 1. Possibilidade de acomodar ferramentas que permitam escavação, corte, limpeza e manipulação de objetos; 	<p>3. ESSENTIAL REQUIREMENTS (numbered [1] to [11])</p> <p>c) MOBILITY [1]</p> <ol style="list-style-type: none"> 1. Possibility to be modified to operate with wheels or tracks 2. Possibility to reach speeds greater than 6 km/h 3. Possibility to climb staircases 4. Possibility to be manually transported by just one operator 5. 3-4 hours of operation life <p>d) WEIGHT [2]</p> <ol style="list-style-type: none"> 1. Mobility system up to 10kg 2. Attached equipment up to 30kg 3. Easily transported by just one operator <p>e) DIMENSIONS [3]</p> <ol style="list-style-type: none"> 1. Small, with the capacity to enter small tunnels and tight spaces 2. Dimensions of the mobility system: 60cm x 40cm x 20cm (length x width x height, respectively) <p>f) RESISTANCE [4]</p> <ol style="list-style-type: none"> 1. Mobility system equipped for shock resistance, allowing for operations to continue even after being overturned 2. Capacity to operate in any weather conditions <p>g) VIDEO, AUDIO AND LIGHTING [5]</p> <ol style="list-style-type: none"> 1. Colour Cameras (at the front, back and sides), with stabilised imaging, including a camera with at least 200° rotation 2. Microphone capable of two-way communication 3. Work lights with dimmer switch 4. Possibility to connect to external monitors <p>h) CONSOLE [6]</p> <ol style="list-style-type: none"> 1. Portable console with camera display system 2. Interoperable with other Remote-Controlled Vehicles of the same series 3. XXXXX <p>i) ROBOT ARM [7]</p>	<p>3. ESSENTIAL REQUIREMENTS (numbered [1] to [11])</p> <p>a) MOBILITY [1]</p> <ol style="list-style-type: none"> 1. Possibility to be modified to operate with wheels or tracks 2. Possibility to reach speeds greater than 6 km/h 3. Possibility to climb staircases 4. Possibility to be manually transported by just one operator 5. 3-4 hour autonomy in normal operation <p>b) WEIGHT [2]</p> <ol style="list-style-type: none"> 4. Up to 10 kg with mobility system. 5. Up to 30 kg with attached equipment. 6. Easily transported by just one operator <p>c) DIMENSIONS [3]</p> <ol style="list-style-type: none"> 1. Small, with the capacity to enter small tunnels and tight spaces 2. Dimensions of the mobility system: 60cm x 40cm x 20cm (length x width x height, respectively) <p>d) RESISTANCE [4]</p> <ol style="list-style-type: none"> 1. Mobility system equipped for shock resistance, allowing for operations to continue even after being overturned 2. Capacity to operate in any weather conditions <p>e) VIDEO, AUDIO AND LIGHTING [5]</p> <ol style="list-style-type: none"> 1. Colour Cameras (at the front, back and sides), with stabilised imaging, including a camera with at least 200° rotation 2. Microphone capable of two-way communication 3. Work Lights with dimmer switch 4. Possibility to connect to external monitors <p>f) CONSOLE [6]</p> <ol style="list-style-type: none"> 1. Portable console with camera display system 2. Interoperable with other Remote-Controlled Vehicles of the same series 3. XXXXX <p>g) ROBOT ARM [7]</p> <ol style="list-style-type: none"> 1. Possibility to accommodate tools for excavating, cutting, cleaning and manipulating objects

<ol style="list-style-type: none"> 2. Possibilidade de acoplar canhão disruptor. 3. Possibilidade de acionar canhão disruptor remotamente; 4. Capacidade de levantar pelo menos 4kg; 5. Ter uma garra com rotação contínua; 6. Ter capacidade de rotação na base de 360°. 	<ol style="list-style-type: none"> 1. Possibility to accommodate tools for excavating, cutting, cleaning and manipulating objects 2. Possibility to attach disarming device 3. Possibility to use disarming device via remote control 4. Capacity to lift at least 4kg 5. Claw with continuous rotation 6. Claw with 360° rotation 	<ol style="list-style-type: none"> 2. Possibility to attach disarming device 3. Possibility to use disarming device via remote control 4. Capacity to lift at least 4 kg 5. Claw with continuous rotation 6. Capacity for 360° rotation
<p>h) CANHÃO DE DISRUPTOR [8]</p> <ol style="list-style-type: none"> 1. Acionado eletricamente; 2. Possibilidade de disparo de cargas de projeção de água, fluidos e projéteis sólidos; 3. Acoplável ao manipulador do VCR (incluindo alma para adaptação ao VCR); 4. Suporte e conjunto de acessórios que permitam efetuar disparo não acoplado ao VCR; 5. Conjunto de consumíveis para disparo de cargas de projeção de água, fluidos e projéteis sólidos (200 unidades); 6. Conjunto de cartuchos para disparo do respetivo canhão (200 unidades). 	<p>j) DISARMING DEVICE [8]</p> <ol style="list-style-type: none"> 1. Electronically driven 2. Possibility to shoot water, other fluids and solid projectiles 3. Attachable to the RCV robot arm (with capacity to adapt to RCV) 4. Bracket and set of accessories which allow shooting independent of the RCV 5. Set of supplies for shooting water, other fluids and solid projectiles (200 units) 6. Set of cartridges for shooting from the respective device (200 units) 	<p>h) DISARMING DEVICE [8]</p> <ol style="list-style-type: none"> 1. Electronically driven 2. Possibility to shoot water, other fluids and solid projectiles 3. Attachable to the RCV robot arm (with capacity to adapt to RCV) 4. Bracket and set of accessories which allow shooting independent of the RCV 5. Set of consumables for shooting water, other fluids and solid projectiles (200 units) 6. Set of cartridges for shooting from the respective device (200 units)
<p>i) CAIXA RÍGIDA [9]</p> <ol style="list-style-type: none"> 1. Em material rígido e durável, permitindo o armazenamento acondicionado do equipamento e acessórios, e respetivo transporte; 	<p>k) STURDY CONTAINER [9]</p> <ol style="list-style-type: none"> 1. Made of sturdy and durable material, allowing for storage of equipment and accessories during transportation 	<p>i) RIGID CONTAINER [9]</p> <ol style="list-style-type: none"> 1. Made of rigid and durable material, allowing for storage of equipment and accessories during transportation
<p>j) MOCHILA DE TRANSPORTE [10]</p> <ol style="list-style-type: none"> 1. Mochila tática, em material rígido e durável, adaptada aos requisitos do equipamento, permitindo transporte acondicionado do equipamento e acessórios, e do canhão disruptor e respetivo lote de consumíveis. 	<p>l) TRANSPORT BAG [10]</p> <ol style="list-style-type: none"> 1. Tactical bag made of sturdy and durable material, adapted for the requirements of the equipment, allowing for storage of equipment and accessories during transportation and of disarming device and respective supply batch. 	<p>j) TRANSPORT BAG [10]</p> <ol style="list-style-type: none"> 1. Tactical bag made of rigid and durable material, adapted for the requirements of the equipment, for stowing and transporting the equipment and accessories and of disarming device and respective batch of consumables.
<p>k) CONSTRUÇÃO E MANUTENÇÃO 1º ESCALÃO [11]</p> <ol style="list-style-type: none"> 1. Construção modular, que permita a substituição/acoplagem de sobressalentes/componentes de forma versátil e rápida; 2. Possibilidade de execução de manutenção de 1º escalão pelo operador e substituição de módulos danificados. 	<p>m) CONSTRUCTION AND MAINTENANCE [11]</p> <ol style="list-style-type: none"> 1. Modular construction allowing for versatile and quick substitution / attachment of spare parts/components; 2. Possibility for maintenance to be performed by the Operator as well as the substitution of damaged parts. 	<p>k) CONSTRUCTION AND 1st LEVEL MAINTENANCE [11]</p> <ol style="list-style-type: none"> 1. Modular construction allowing for versatile and quick substitution/attachment of spare parts /components; 2. Possibility for 1st level maintenance to be performed by the Operator as well as the substitution of damaged parts.

ANNEX VI – UNIVERSITY TRANSCRIPT – UKRAINE



Instituto de Engenharia e Tecnologia de Cherkasy

ANEXO AO DIPLOMA DE ESPECIALISTA LD VE № XXXXX

(não é válido sem Diploma)

O presente Anexo ao Diploma certifica que **XXXXX** estudou no período de **19XX** a **19XX** no Instituto de Engenharia e Tecnologia de Cherkasy, com a especialidade – Construção Civil e Industrial, tendo sido aprovado nos exames e provas das seguintes disciplinas:

Nº	Nome da disciplina	Carga horária	Classificação
1	2	3	4
1	História da Ucrânia	108	excelente
2	Comunismo Científico	54	aprovado
3	Cultura Ucraniana e Estrangeira	108	excelente
4	Filosofia	108	excelente
5	Princípios da Psicologia e Pedagogia	54	aprovado
6	Estudos Religiosos	54	aprovado
7	Princípios das Teorias Económicas	108	excelente
8	Politologia	108	excelente
9	Princípios do Direito	54	aprovado
10	Sociologia	54	aprovado
11	Língua Estrangeira	405	bom
12	Educação Física	360	bom
13	Princípios do Direito Constitucional	54	aprovado
14	Matemática Avançada	594	bom
15	Física	270	bom
16	Química	108	excelente
17	Mecânica Teórica	270	excelente
18	Técnica Computacional e Programação	108	excelente
	Trabalho Prático	54	excelente
19	Introdução à Análise Sistemática	54	aprovado
20	Princípios da Ecologia	54	aprovado
21	Segurança do Trabalho	108	bom
22	Mecânica Técnica dos Fluidos e Gases	108	bom
23	Introdução à Construção	27	aprovado
24	Resistência dos Materiais	351	bom
25	Mecânica de Construção	100	bom
26	Ciência dos Materiais de Construção	189	bom
	Trabalho Prático	108	bom
27	Engenharia Gráfica	270	bom
28	Metrologia e Standardização	54	aprovado
29	Engenharia Geodésica	108	bom
	Trabalho Prático	108	excelente
30	Engenharia Geológica	54	excelente
	Trabalho Prático	54	excelente
31	Prospecções de Engenharia	54	excelente
	Trabalho Prático	54	excelente
32	Redes de Abastecimento de Água e Esgotos	54	excelente
33	Arquitetura dos Edifícios e Construções	270	bom
	Projeto Anual		bom

1	2	3	4
34	Planeamento Urbano	54	bom
35	Técnica de Construção	108	bom
36	Tecnologia da Produção na Construção Civil	243	bom
	Trabalho Prático	108	bom
	Projeto Anual		bom
37	Organização da Construção Civil	162	excelente
	Trabalho Prático	84	bom
	Curso Anual		excelente
38	Economia da Construção Civil	162	bom
39	Base Produtiva da Construção Civil	54	bom
	Trabalho Prático	108	bom
40	Eletrotecnia em Construção Civil	54	excelente
41	Distribuição de Gás e Calor. Ventilação	54	excelente
42	Transporte e Vias de Comunicação	54	bom
43	Metais e Soldagem em Construção Civil	54	excelente
44	Estruturas Metálicas	216	bom
	Trabalho Prático	54	bom
45	Estruturas de Betão Armado	297	bom
	Projeto Anual		bom
46	Estruturas de Madeira	108	bom
47	Bases e Fundamentos	135	excelente
	Trabalho Prático	54	bom
48	Gestão da Obra de Construção	81	excelente
49	Contabilidade e Auditoria	81	excelente
50	Gestão e Marketing	54	aprovado
51	Método dos Elementos Finitos	74	bom
52	Reconstrução dos Edifícios e Construções	108	bom
	Projeto Anual		excelente
53	Disciplina de Formação Especial	148	excelente
54	Direito Económico	27	aprovado
55	Curso Especial (organizado pelo Departamento)	122	excelente
56	Língua Estrangeira para fins profissionais	52	aprovado
57	Proteção Civil	54	aprovado
58	Segurança do Trabalho	27	aprovado
59	Desenho Assistido por Computador na Construção Civil	54	aprovado
60	Geoecologia	27	aprovado
61	Princípios da Teoria da Confiabilidade	27	aprovado
62	Principais Linhas de Desenvolvimento da Construção Civil	162	excelente
63	Princípios da Atividade Bolseira e Bancária	27	aprovado
64	Ferramentas Informáticas	54	aprovado

Defendeu o projeto (tese) de licenciatura sobre o tema:

“XXXXX”

com a classificação de: Bom.

Foi aprovado no exame estatal com a classificação de: Bom.

O Reitor *[assinatura]*

O Secretário *[assinatura]*

Cidade de Cherkasy, 27 de junho de 19XX

Registo N° XXXXX

Carimbo:

Ministério da Educação da Ucrânia

Instituto de Engenharia e Tecnologia de Cherkasy



Cherkasy Engineering and Technological Institute
SPECIALIST DIPLOMA TRANSCRIPT LD VE № XXXXX
(not valid without the Diploma Certificate)

This attachment hereby certifies that **XXXXX** studied at the Cherkasy Engineering and Technological Institute between the period of **19XX** and **19XX**, specialising in Civil and Industrial Construction, successfully passing the following subjects:

№	Subject	Total Hours	Classification
1	2	3	4
1	History of Ukraine	108	excellent
2	Scientific Communism	54	pass
3	Ukrainian and Foreign Culture	108	excellent
4	Philosophy	108	excellent
5	Principles of Psychology and Pedagogy	54	pass
6	Religious Studies	54	pass
7	Principles of Economic Theories	108	excellent
8	Political Sciences	108	excellent
9	Principles of Law	54	pass
10	Sociology	54	pass
11	Modern Foreign Language	405	good
12	Physical Education	360	good
13	Introduction to Constitutional Law	54	pass
14	Advanced Mathematics	594	good
15	Physics	270	good
16	Chemistry	108	excellent
17	Theoretical Mechanics	270	excellent
18	Computational Techniques and Programming	108	excellent
	Practical Work	54	excellent
19	Introduction to Systematic Analysis	54	pass
20	Principles of Ecology	54	pass
21	Workplace Safety	108	good
22	Technical Mechanics - Fluids and Gases	108	good
23	Introduction to Construction	27	pass
24	Resistant Materials	351	good
25	Mechanical Construction	100	good
26	Science of Construction Materials	189	good
	Practical Work	108	good
27	Graphic Engineering	270	good
28	Metrology and Standardization	54	pass
29	Geodetic Engineering	108	good
	Practical Work	108	excellent
30	Geological Engineering	54	excellent
	Practical Work	54	excellent
31	Prospecting	54	excellent
	Practical Work	54	excellent
32	Water and Sewage Supply Networks	54	excellent
33	Architecture of Buildings and Constructions	270	good
	Annual Project		good

1	2	3	4
34	Urban Planning	54	good
35	Construction Techniques	108	good
36	Technology of Civil Construction Production	243	good
	Practical Work	108	good
	Annual Project		good
37	Civil Construction Organization	162	excellent
	Practical Work	84	good
	Annual Course		excellent
38	Civil Construction Economics	162	good
39	Productive Base in Civil Construction	54	good
	Practical Work	108	good
40	Civil Construction Electrotechnics	54	excellent
41	Distribution of Gas and Heat. Ventilation	54	excellent
42	Transport and Means of Communication	54	good
43	Metals and Welding in Civil Construction	54	excellent
44	Metallic Structures	216	good
	Practical Work	54	good
45	Structures of Reinforced Concrete	297	good
	Annual Project		good
46	Wooden Structures	108	good
47	Bases and Foundations	135	excellent
	Practical Work	54	good
48	Construction Works Management	81	excellent
49	Accounting and Auditing	81	excellent
50	Management and Marketing	54	pass
51	Method of Finite Elements	74	good
52	Reconstruction of Buildings and Constructions	108	good
	Annual Project		excellent
53	Special Training	148	excellent
54	Economic Law	27	pass
55	Special Course (organized by the Department)	122	excellent
56	Modern Foreign Language (Business)	52	pass
57	Civil Protection	54	pass
58	Workplace Safety	27	pass
59	CAD in Civil Construction	54	pass
60	Geocology	27	pass
61	Principles of the Reliability Theory	27	pass
62	Principles Lines of Development of Civil Construction	162	excellent
63	Principles of Grants and Banking Activity	27	pass
64	Computing Tools	54	pass

The above named presented the Undergraduate project (Dissertation) based on the following theme:
“XXXXX”

and was awarded the classification: Good.

State exam classification: Good.

President [Signature]

Secretary [Signature]

Cherkasy, 27 June 19XX

Registration No.: XXXXX

Stamp:

Ministry of Education of Ukraine

Cherkasy Engineering and Technological Institute



Grant Thornton

Certificação Legal das Contas

Grant Thornton & Associados – SROC, Lda.
Edifício Amadeo Souza Cardoso
Alameda António Sérgio, 22, 11.º Miraflores –
1495-132 Algés – Portugal
T +351 214 123 520
F +351 214 123 539
Avenida Arriaga, 30 – 1.º B – 9000-064
Funchal – Portugal
T +351 291 200 540
F +351 291 200 549
E-mail: gt.lisboa@pt.gt.com

Introdução

1. Examinámos as demonstrações financeiras da **XXXXX**, as quais compreendem o Balanço em 31 de dezembro de 2013 (que evidencia um total de 34.660.336 euros e um total de capital próprio de 18.142.594 euros, incluindo um resultado líquido negativo de 1.023.228 euros), as Demonstrações dos resultados por naturezas e por funções e a Demonstração das alterações no capital próprio e a Demonstração dos fluxos de caixa do exercício findo naquela data, e o correspondente Anexo.

Responsabilidades

2. É da responsabilidade da Gerência a preparação de demonstrações financeiras que apresentem de forma verdadeira e apropriada a posição financeira da Empresa, o resultado das suas operações e os fluxos de caixa, bem como a adoção de políticas e critérios contabilísticos adequados e a manutenção de um sistema de controlo interno apropriado.
3. A nossa responsabilidade consiste em expressar uma opinião profissional e independente, baseada no nosso exame daquelas demonstrações financeiras.

Âmbito

4. Exceto quanto às limitações descritas no parágrafo 7 abaixo, o exame a que procedemos foi efetuado de acordo com as Normas Técnicas e as Diretrizes de Revisão/Auditoria da Ordem dos Revisores Oficiais de Contas as quais exigem que o mesmo seja planeado e executado com o objetivo de obter um grau de segurança aceitável sobre se as demonstrações financeiras estão isentas de distorções materialmente relevantes. Para tanto o referido exame incluiu:
 - a) A verificação, numa base de amostragem, do suporte das quantias e divulgações constantes das demonstrações financeiras e a avaliação das estimativas, baseadas em juízos e critérios definidos pela Gerência, utilizadas na sua preparação;
 - b) A apreciação sobre se são adequadas as políticas contabilísticas adotadas e a sua divulgação, tendo em conta as circunstâncias;
 - c) A verificação da aplicabilidade do princípio da continuidade; e
 - d) A apreciação sobre se é adequada, em termos globais, a apresentação das demonstrações financeiras.
5. O nosso exame abrangeu também a verificação da concordância da informação financeira constante do relatório de gestão com as demonstrações financeiras.

6. Entendemos que o exame efetuado proporciona uma base aceitável para a expressão da nossa opinião.

Reserva

7. Em 31 de dezembro de 2013, a Empresa detém ativos fixos tangíveis, afetos às instalações produtivas instaladas no concelho da Guarda, cujo valor líquido contabilístico ascende a, aproximadamente, 4.260.000 euros. A atividade produtiva da Empresa à qual tais ativos se encontram afetos, tem vindo a apresentar, ao longo dos últimos exercícios, indicadores operacionais e de rentabilidade negativos. Contudo, a empresa não efetuou um teste de imparidade para determinar se o montante, pelo qual aqueles ativos se encontram refletidos no balanço anexo, é superior ao respetivo valor de mercado ou de recuperação, pelo que, na ausência da referida análise de imparidade, não nos foi possível quantificar o eventual efeito, se algum, desta situação nas demonstrações financeiras anexas.

Opinião

8. Em nossa opinião, exceto quanto ao efeito dos ajustamentos que poderiam revelar-se necessários caso não existissem as limitações descritas no parágrafo 7 acima, as referidas demonstrações financeiras apresentam de forma verdadeira e apropriada, em todos os aspetos materialmente relevantes, a posição financeira da **XXXXX**, em 31 de dezembro de 2013, o resultado das suas operações e os fluxos de caixa no exercício findo naquela data, em conformidade com os princípios contabilísticos geralmente aceites em Portugal.

Relato sobre outros requisitos legais

9. É também nossa opinião que a informação constante do relatório de gestão é concordante com as demonstrações financeiras do exercício.

Ênfase

10. Sem afetar a opinião expressa no parágrafo 9 acima, chamamos a atenção para o facto de a situação descrita no parágrafo 8 da Certificação Legal das Contas de 31 de dezembro de 2012, relacionada com o facto de alguns bens não terem sido registados como locações financeiras, de acordo com o estipulado na Norma de Contabilidade e Relato Financeiro n.º 9, ter deixado de ser mencionada como reserva, em virtude dos montantes em causa não serem suscetíveis de afetar, de forma materialmente relevante, as contas da empresa.

14 de abril de 2014

Grant Thornton & Associados – SROC, Lda.
Representada por C. Lisboa Nunes

Statutory Auditor's Report

Grant Thornton & Associados – SROC, Lda.

Edifício Amadeo Souza Cardoso
Alameda António Sérgio, 22, 11.º Miraflores –
1495-132 Algés – Portugal

Tel: (+351) 214 123 520
Fax: (+351) 214 123 539

Avenida Arriaga, 30 – 1.º B – 9000-064
Funchal – Portugal

Tel: (+351) 291 200 540
Fax: (+351) 291 200 549

E-mail: gt.lisboa@pt.gt.com

Introduction

1. We examined the financial statements of **XXXXX**, comprised of the Balance up to 31 December 2013 (which showed a total of 34,660,336 euros and a total shareholder's equity of 18,142,594 euros, including a resulting net loss of 1,023,228 euros), the income statements by nature and by function, the statement of changes in equity and the cash flow statement, for the year then ended, as well as the corresponding annex.

Responsibilities

2. The Board of Directors is responsible for preparing financial statements that give a true and fair view of the company, the result of its operations and its cash flow, adopting the appropriate accounting policies and criteria and maintaining an appropriate internal control system.
3. Our responsibility consists of giving a professional and independent report based upon our examination of the financial documents listed above.

Scope

4. Except in regard to the limitations outlined in paragraph 7, our examination was conducted in accordance with the Standards and Technical Recommendations of the Portuguese Institute of Statutory Auditors, which require the examination to be planned and executed in such a way as to achieve an acceptable degree of certainty as to whether the financial statements are free of any materially relevant distortions. The aforementioned examination included:
 - b) Using sampling to verify the documents supporting the amounts and information in the financial statements and evaluating estimates, based on criteria defined by the Board of Directors and used in preparing them.
 - c) Considering whether the accounting policies adopted and presented were appropriate under the circumstances.
 - d) Verifying the applicability of the principle of continuity of operations.
 - e) Deciding whether the overall presentation of the financial statements was appropriate.
5. Our examination also included checking whether the financial information in the Annual Report was in agreement with the financial statements.
6. We are of the opinion that our examination provided an acceptable basis for forming our opinion.

Reserve

7. As of 31 December 2013, the company holds tangible fixed assets in the form of production facilities, located in the county of Guarda, whose net value reaches approximately 4,260,000 euros. The company's production activity, including the aforementioned assets, demonstrates negative operational indicators and financial loss. However, the company had not conducted an impairment test to determine if the sum (the figure of which – as outlined in the attached balance – includes the aforementioned assets) is higher than the respective market or recovery value. Without the impairment analysis, it was impossible to measure the effect, if any, of this situation on the attached financial statements.

Opinion

8. In our opinion, except for the effect of the adjustments which could become necessary if the limitations described in paragraph 7 did not exist, the financial statements give a true and fair view of all materially relevant aspects of the financial situation of Dura Automotive Portuguesa – Indústria de Componentes para Automóveis, Lda., as of 31 December 2013, the result of its operations and cash flows for the year ending on the above date, according to generally accepted accounting principles in Portugal.

Report about other legal requirements

9. We are also of the opinion that the information relating to the Annual Report is in accordance with the financial statements.

Remark

10. Without affecting the opinion expressed in paragraph 9, we would like to bring attention to the fact that the situation described in paragraph 8 of the Statutory Auditors' Report of 31 December 2012, concerning the fact that some goods were not registered as finance leases in accordance with the terms of the Accounting Standards and Financial Report 9, was not mentioned in the reserve in virtue of the amounts concerned not affecting the company accounts in a materially relevant way.

14 April 2014

Grant Thornton & Associados – SROC, Lda.
Represented by C. Lisboa Nunes