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Lexicography for specific purposes. Equivalence in bilingual and multilingual specialised dictionaries with reference to conceptual systems.

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Abstract

Terminological equivalence is one of the central issues in translation. To secure equivalence in translations for special purpose languages, the translator has to structure the terms of a given text by reference to a conceptual system and thus identify – independently for both the source and target languages - the conceptual system in which a specific term is embedded. Bilingual and multilingual dictionaries are indispensable tools for any translator. However, due to the importance of the conceptual systems in specialised-language translation, a specialised dictionary has to fulfill higher requirements than general dictionaries. As a matter of fact, a dictionary suitable for specialised-language translation should follow an onomasiological rather than a semasiological approach to lexicography. In this paper, the author studies the basic requirements for a bilingual dictionary that is intended to be of practical use for specialised-language translation, taking a user's perspective when discussing the problem of equivalence between terms in two languages. This is based on selected concepts taken from the field of accounting (IAS/IFRS and national accounting rules) that are translated from German to Spanish and vice versa. While the dictionaries examined are generally well prepared, the study shows that none of them includes information necessary to a translator for ensuring a correct translation.

Keywords

- special-language translation
- terminological equivalence
- conceptual system
- bilingual or multilingual dictionaries
- onomasiological vs. semasiological approach
- lexicography
- accounting
- IAS/IFRS

Introduction

As a starting-point, let us consider the following scenario:

A consulting company is preparing a study on the international oil industry. One of the tasks within this study is to compare oil companies in Spanish-speaking countries (e.g. Repsol) and German-speaking countries, such as the Austrian group OMV. The consultants hire a professional translator to tranlate the relevant texts (annual reports) from Spanish into German and vice versa.

One of the crucial fields for the translator's work is accounting. In order to assess which dictionaries might prove useful for this task, the current paper studies bilingual specialised (i.e. economic) dictionaries. Also this study establishes principles to which dictionaries should comply in order to be useful for professional specialised language translations. This will be demonstrated by looking at German–Spanish, Spanish-German translations.

The accounting terms I use for the demonstration are basic terms within the terminological hierarchy.

Before discussing the study I shall briefly elaborate on the concept of terminological equivalence, one of the central issues in translation. In specialised-language translation, the translator has to structure terms of a given text by reference to a conceptual system. Therefore, it is highly important to identify the conceptual system a term is embedded in, independent from both the source language and the target language. Finding correct terminologies in both the source and the target languages is not only a linguistic task, but the translator has to enter into the field of knowledge. He also has to compare the two or more linguistic systems meticulously at all levels, possibly by consulting experts.

Bilingual dictionaries are an indispensable tool for any translator. However, due to the fact that in the field of specialised-language translation the conceptual field is so important, the requirements of such a dictionary are higher than of normal dictionaries. Generally speaking, a dictionary suitable for specialised-language translation should conform to an onomasiological approach rather than the usual semasiological approach of lexicography.

Equivalence

Equivalence in translation (translational equivalence) is one of the most controversial topics in translation theory. I will refrain from entering into the discussion whether this concept is suited to the translation theory and refer to Stolze (2008, 87ff.).

However, I'd like to point out that for the scope of this study the so-called relative equivalence theories seem to be well suited. In this context I'd like to refer to Koller (2001, 248ff.) and his statements regarding pragmatic equivalence.

Pommer (2006, 64 f.) shows that legal concepts have their origins in different legal systems with different cultural roots, which leads her to the conclusion that absolute equivalence between legal terminologies of different legal orders is impossible. De Groot (1999, 45f.), however, concedes that absolute equivalence is possible if two different legal orders have adopted their terms from a third system. This finding is important for the scope of my work, because accounting is a rather homogeneous field in Europe due to the harmonization work done by the EU, resulting in the IAS/IFRS.

For the definition of terminological equivalence I follow Arntz/Picht/Mayer (2009, 151 ff.), who distinguish between *complete equivalence* and *no equivalence*. Complete equivalence exists if two terms, A and B are identical in each and every characteristic of the concept [A = B], whereas in the case of no equivalence none of the characteristics of A and B are equivalent [A \neq B]. Within the scope of this study I disregard the categories of *overlapping* and *inclusion* used by the authors. For practical reasons I would slightly change the above definition and rather speak of the identity of all *essential* characteristics of the concept than of all the characteristics.

In translation of communication acts between experts, the first and foremost aim is that the translation shall have the same communicative function as the source text. The translator will therefore use the same functional style as a person writing the text in his/her language (Stolze 2009, 202). Pommer (2006, 66) equally stresses the principle of functional equivalence when it comes to develop a translation strategy.

Conceptual systems in dictionaries; onomasiological vs. semasiological approach

In specialised languages, it is of utmost importance not to study concepts in isolation, but within their relevant fields of knowledge. ISO 1097 defines *concept system* as a *set of concepts structured according to the relations among them*. It is an indispensable prerequisite for any terminology work in several languages to draw up separate monolingual systems of concepts before a bilingual or multilingual glossary can be prepared (Arntz/Picht/Mayer 2009, 72).

The following is a brief example: A translator has to translate the Spanish term *amortización* into German. The first thing he/she has to do is to clarify which conceptual field the term belongs to: Within the field of accounting, *amortización* means *amortization/depreciation* with the German equivalent *Abschreibung*; in a context of finance, the term means *repayment* and should be rendered into German by *Tilgung*.

The semasiological approach to lexicography starts from the word and lists all meanings of a word while the onomasiological approach starts from the meaning of a concept and studies words expressing this meaning. Most language dictionaries are structured alphabetically (Arntz/Picht/Mayer 2009, 189).

For legal dictionaries, Arntz/Picht/Mayer (2009, 211) state that it is indispensable to follow a methodological approach that takes into acccount the conceptual structures of the two legal systems involved. The onomasiological approach is reflected in the structure of these dictionaries. The authors' conclusions equally apply to the field of accounting terminology, which, as we shall see, are sets of rules set by European or national legislators.

Systems of accounting

IAS/IFRS

Making accounting standards comparable at an international level is not a new idea. The London-based International Accounting Standards Committee (IASC) was founded as early as 1973 as an association offering membership to national organizations of accountants and auditors. For many years, the IASC kept a rather low profile, until the EU decided in 2000 to cooperate with the IASC on promoting the development of international accounting standards.

In 2001, the IASC was restructured and renamed into IASB (International Accounting Standards Board). The total of International Accounting Standards (IAS) that had been adopted so far by the IASC remained valid until the IASB either gradually modified them or replaced them by new standards. The new accounting standards developped by the IASB have been named International Financial Reporting Standards (IFRS) and numbered continuously. The first new standard was published by the IASB in June 2003. Further standards are continuously being adopted by the IASB. To secure that these standards become effective, the European Union adopts them under the so-called endorsement process. They don't need to be incorporated into national law, since EU Directives are binding for all member states (IFRS/IAS-Portal).

The Regulation (EC) No. 1606/2002 of the European Parliament and of the Council of 19 July 2002 on the application of international accounting standards requires that from 2005 on all listed EU companies (including banks and insurance companies) must prepare their consolidated financial statements in strict accordance with IAS. Member States may also permit or require companies to apply the system to their annual accounts. They may also require application of the new rules in non-publicly traded companies.

The Regulation's objective is the adoption and use of international accounting standards in the European Union with a view to harmonising the financial information presented by the companies referred to in Article 4 in order to ensure a high degree of transparency and comparability of financial statements and hence an efficient functioning of the Community capital market and of the Internal Market.

Definitions

IAS/IFRS

The International Accounting Standards (IAS) have been adopted by the London-based International Accounting Standards Board, on which the Commission is represented. As of 2002 these common rules have been known as *International Financial Reporting Standards (IFRS)*.

For the purpose of the EU Regulation, *international accounting standards* includes the International Accounting Standards (IAS), the International Financial Reporting Standards (IFRS) and related Interpretations (SIC-IFRIC interpretations), subsequent amendments to those standards and related interpretations, future standards and related interpretations

issued or adopted by the International Accounting Standards Board (IASB) (Wagenhofer 2009, 82 ff.).

IASB Framework

The IASB *Framework for the Preparation and Presentation of Financial Statements* (The *Framework*) sets out the concepts that underlie the preparation and presentation of financial statements (i.e. the objectives, assumptions, characteristics, definitions, and criteria that govern financial reporting). Therefore, the *Framework* is often referred to as the *conceptual framework* (Nandakumar et. al., 2010:11).

National systems Austria/Germany: UGB/HGB

In Austria the financial statements have to be prepared according to the rules of the Rechnungslegungsgesetz, which are part of the Unternehmensgesetzbuch (UGB §§ 189-283). In Germany, companies have to apply the Handelsgesetzbuch (HGB), whose accounting rules are practically identical with the UBG.

Listed companies, however, have to prepare their consolidated statements in accordance with the international accounting principles. For these companies, the rules of HGB/UGB have to be applied for the preparation of separate financial statements (Wagenhofer 2009, 115).

National system Spain: Plan General de Contabilidad

In Spain all companies have to prepare their financial statements according to the Real Decreto 1514/2007 in its latest version (2010).

In comparison with the former Plan General de Contabilidad (valid until 1/1/2008) the new plan adopted many characteristic from the IAS/IFRS. See: <u>http://noticias.juridicas.com/base_datos/Derogadas/r0-pgc.html#</u>

Terminology used in practice

Companies do not always follow the terminology laid down in the legal bodies in their published statements. Consequently, for the purpose of this study, I consider the actually used terminology as a separate conceptual system. I have chosen three major Spanish companies (Repsol, Endesa, Inditex) and three German/Austrian firms (Daimler, Siemens, OMV), whose annual reports I examine.

Concepts

In the following, I study a limited number of basic concepts. The conceptual fields these concepts belong to are EU regulations, national (i.e. Spanish and German/Austrian) legislation and the terminolgy used by the companies themselves. The following EU sources are borne in mind:

- Comments concerning Articles of the Regulation (EC) No 1606/2002
- COMMISSION REGULATION (EC) No 2238/2004 of 29 December 2004
- COMMISSION REGULATION (EC) No 1126/2008 of 3 November 2008
- COMMISSION REGULATION (EC) No 1274/2008 of 17 December 2008

Elements of Consolidated Financial statements: Statement of financial position / balance sheet

IAS as from 2009

According to Regulation (EC) No 1274/2008 of 17 December 2008, each company shall apply IAS 1 (revised in 2007), as from 2009. This Regulation states that a complete set of financial statements comprises

(a) a statement of financial position

- (b) a statement of comprehensive income
- (c) a statement of changes in equity
- (d) a statement of cash flows
- (e) notes

and adds that a company entity may use titles for the statements other than those set out in the standard.

In the following, I focus on the first item "(a) statement of financial position"

English	German	Spanish
statement of financial position	Bilanz	estado de situación financiera

We can see that, other than the Spanish translation, the German version does not use the newly coined English term. This is in accordance with the standard which permits using other terms as part of a financial statement.

IAS valid until 2008

In Regulation (EC) No 1126/2008 of 3 November 2008, however, this item was called *balance sheet* in English. The German and Spanish terms are as follows:

German	Spanish
Bilanz	balance

Terminology used in practice

In the consolidated financial statements in the original and in English, the following terms are used by the different companies:

Statement of financial position/balance sheet/Spain 2009

Company	Spanish version	English version
Repsol	balance (de situación)	balance sheet
Endesa	balance (de situación)	balance sheet
Inditex	balance (de situación)	balance sheet

Statement of financial position/balance sheet/Germany/Austria 2009

Company	German version	English version
Daimler	Bilanz	balance sheet
Siemens	Bilanz	statement of financial position
OMV	Bilanz	balance sheet

None of the Spanish companies has adopted the new terminology in their annual reports, neither in the Spanish nor in the English versions. While the German terminology has remained unchanged, it is interesting to note that one of the companies, Siemens, uses the new term in the English version of their financial statement.

Classification in the statement of financial position/balance sheet: Assets, liabilities, equity

IAS / Consolidated statement

Elements

According to the Framework in the three languages that are relevant for this study, the elements directly related to the measurement of financial position in the balance sheet are

- assets (Vermögenswerte; activos)
- liabilities (Schulden; pasivos)
- equity (Eigenkapital; patrimonio neto)

Classification of assets

IAS 1.60 requires a distinction between current and non-current assets: "An entity shall present current and non-current assets, and current and non-current liabilities, as separate classifications in its statement of financial position in accordance with paragraphs 66–76 except when a presentation based on liquidity provides information that is reliable and more relevant. When that exception applies, an entity shall present all assets and liabilities in order of liquidity."

Separate statements: Austria/Germany

Elements of the balance sheet

The HGB/UGB scheme classifies the elements of the balance sheet in

- Aktiva (assets)
- Passiva (liabilities and equity).

Classification of assets

According to HGB/UGB, assets have to be classified as either *Anlagevermögen* or *Umlaufvermögen*. This distinction is largely identical with the current/non current distinction in English.

Separate statements: Spain

Elements of the balance sheet

A balance sheet comprises

- activos
- pasivos y patrimonio neto.

We see that, other than in Germany and Austria, Spanish legislation follows the classification set out in the Framework.

Classification of assets

The Plan General de Contabilidad requires a distinction between activos corrientes and activos no corrientes. By doing so, it follows the IAS rules in its terminology.

Terminology used in practice

Consolidated statements Spain

Repsol

Spanish version	<i>English version</i>
activo	assets
activo no corriente	non-current assets
activo corriente	current assets
pasivo y patrimonio neto	liabilities and equity
• Endesa	
Spanish version	<i>English version</i>
activo	assets
activo no corriente	non-current assets
activo corriente	current assets
patrimonio neto y pasivo	equity and liabilities
• Inditex	
<i>Spanish version</i>	<i>English version</i>
activo	assets
activo no corriente	non-current assets

For their consolidated statements, all Spanish companies examined use the IAS/IFRS terminology, with slight deviations in their word order.

assets

current assets

English version

current assets

non-current assets

equity and liabilities

equity and liabilities

Consolidated statements Germany/Austria

• Daimler

activo corriente

pasivo y patrimonio neto

German version Aktiva Langfristige Vermögenswerte Kurzfristige Vermögenswerte Passiva

Siemens

German Aktiva No global designation Kurzfristige Vermögenswerte Passiva

OMV

German Vermögen Langfristiges Vermögen Kurzfristiges Vermögen Eigenkapital und Verbindlichkeiten English assets No global designation current assets liabilities and equity

English assets non-current assets current assets equity and liabilities

The distinction between *langfristige/kurzfristige Vermögenswerte* and *langfristiges/kurzfristiges Vermögen* reflects the terminology used in the IAS/IFRS, which, however, do not use the terms *Aktiva/Passiva* which are used in the German reports.

Separate statements Spain

Repsol

English version
not available
not available
not available
not available

For the separate statements, the Spanish company Repsol uses the terminology set out in the Plan General de Contabilidad, which, as already mentioned, does not differ from the IAS/IFRS terms in the aspects studied in this paper.

Separate statements Germany/Austria

• Daimler

German version Aktiva Anlagevermögen Umlaufvermögen Passiva

OMV

German version Aktiva Anlagevermögen Umlaufvermögen Passiva English version assets fixed assets non-fixed assets equity and liabilities

English version assets fixed assets current assets liabilities

The two main elements of the balance sheet are called *Aktiva* and *Passiva*; for the classification of assets, the two companies use the terms *Anlagevermögen/Umlaufvermögen*. These are the terms set out in the HGB/UGB. The mix between traditional accounting terminology and IAS/IFRS terminology is a distinguishing feature of the English translations of these reports.

Translation and equivalence

Terminological differences

The three conceptual systems analysed in this paper include a number of terminological patterns:

Consolidated statements

• In Spanish, the statement of financial position/balance sheet is called *estado de situación financiera* in 2009 and *balance* in 2008, whereas in German it is *Bilanz* for both years.

Separate statements

- In Spanish, the elements of the statement of financial position/balance sheet are classified into *activos*, *pasivos* y *patrimonio neto*;
- The assets comprise *activos corrientes* and *activos no corrientes*; in both cases, the terminology follows the IAS classification;
- In German, the parts of the statement of financial position/balance sheet are *Aktiva* and *Passiva*;
- Assets are classified into Anlagevermögen and Umlaufvermögen.

Terminology used in practice

In the reports prepared by the companies, there are a number of terminological exceptions from the rules:

- None of the Spanish companies examined uses *estado de situación financiera*, preferring instead the traditional term *balance (de situación)*;
- With regard to the other terms, the Spanish companies use the IAS terminology both in their consolidated and their separate statements;
- In German, two companies use *Passiva* instead of the IAS term *Eigenkapital und Verbindlichkeiten* in their consolidated statements ;
- The HGB/UGB terms *Anlagevermögen/Umlaufvermögen* are used in the separate statements rather than the IAS terms *Langfristiges Vermögen/Kurzfristiges Vermögen*.

Equivalence

In order to ensure an accurate translation, the translator must be aware of the terminological situation. This is the case, for example, when s/he defines the translation strategy s/he might choose to stress the terminological differences between the consolidated and the separate statements in German. This can be achieved by the following translations:

Consolidated statement (2009)

German	Spanish option I	Spanish option II
Bilanz	balance	estado de situación financiera

Choosing option I, the translator would emphasize that there are Spanish companies which disregard the change of designation in the Spanish version of the new IAS 1.

Separate statement

Spanish	German option I	German option II
activo no corriente	Anlagevermögen	langfristiges Vermögen
activo corriente	Umlaufvermögen	Kurzfristiges Vermögen
patrimonio neto y pasivo	Passiva	Eigenkapital und Verbindlichkeiten

The translator might prefer the first option (German I) because it allows him/her to stress the terminological differences between the separate and the consolidated statements in Germany/Austria. These differences are due to the differences in the rules applicable to either type of statement.

Dictionaries

In order to be of use to a translator and to allow him/her to respect the principle of equivalence, a dictionary should state the conceptual fields the translations are valid for. So far, I have defined three conceptual fields for the purpose of this study. In the following, I am going to analyse several dictionaries specialised in economic terms to find out whether they provide the information required by its users.

Becher (German-Spanish)

The *Wörterbuch Recht, Wirtschaft, Politik* is an excellent and prestigeous dictionary for legal and economic terms. But while it provides information about some conceptual fields, for example *Steuerrecht, Arbeitsrecht, EU, Österreich*, it lacks information I defined as necessary.

Here are three examples of entries in the German-Spanish part:

- Vermögenswerte: valores patrimoniales, bienes, elementos del activo, haberes;
- *Eigenkapital*: Capital propio, capital de accionistas, pasivo propio, valor (o patrimonio) neto, fondos propios;
- *Aktiva*: activo, cuentas del activo, valores positivos, recursos, data.

While Becher is not an accounting dictionary, further information about conceptual fields, at least on the general subject of accounting, is required.

Grünberger, English for Accountants (German-English)

Since there seem to be no German/Spanish dictionaries that fulfill the need for information on conceptual fields, it might be necessary to work with two dictionaries: a German/English and an English/Spanish one.

As a first example of a German/English dictionary, I have chosen *English for Accountants* by David and Herbert Grünberger, two renowned experts in accounting and IFRS.

Here are three examples of entries in the dictionary:

- asset: Aktivseitiges Vermögen, Anlage- und Umlaufvermögen;
- current assets: Umlaufvermögen;
- noncurrent assets: Anlagevermögen.

While the translations are accurate, the dictionary, however, does not indicate the conceptual fields the words belong to. This is the case, for example, with the proposed translation of *current/noncurrent assets* which might be misleading when applied to consolidated statements of listed companies.

The structure of this dictionary, therefore, does not meet the needs of a professional translator.

Wulf et.al., International Financial Reporting Standards Wörterbuch/Dictionary (German-English)

This dictionary is specialised in IAS/IFRS terminology.

Examples of entries are

• *Bilanz:* Statement of financial position. A statement showing an entity's financial position at the end of the reporting period.... IAS 1 changed the title "balance sheet" to "statement of financial position".

While this entry contains useful information an important fact, however, is missing, namely that companies may choose other terms. This explains the use of *balance* by our Spanish sample companies.

• Aktiva>Vermögenswerte

The reference is correct because it is an IFRS dictionary.

• Kurzfristiger Vermögenswert: Current asset...

We can conculude that this dictionary is excellent and very useful. For our current purpose, however, it lacks information necessary for the translator as it is limited to IFRS terminology.

Schellenberg Accounting A-Z (German-English-French-Italian)

This dictionary is the best dictionary for the present purpose among those examined in this study. In the foreword, the authors state: "...Übersetzungsvorschläge...; werden sie doch je nach angewandter Norm unterschiedlich übersetzt. Wo immer möglich, werden zu den Fachbegriffen die anwendbaren Buchführungs- und Rechnungslegungsvorschriften der Schweiz, Deutschlands und/oder der EU (IFRS) vorgestellt. Dem Leser wird damit ein vergleichender Einblick in die drei Normensysteme ermöglicht."

These remarks show that the authors are aware of the importance of legal systems, i.e. conceptual fields, for the translator.

The book is divided into two parts: In the first part, *Fachbegriffe Deutsch-Français-Italiano-English*, the reader finds a list of terms in German and the other three languages without any accompanying notes or comments. In the second part, the dictionary explains a large number of the German terms in German. Examples of entries are

Abschluss

- Fachbegriffe: Abschluss; état financier; bilancio; financial statement.
- Explanations: Concept of a financial statement; elements of financial statements according to IFRS, to Swiss and to German legislation, some remarks on differences in accounting rules between the legal systems.

Bilanz

- Fachbegriffe: Bilanz; bilan, compte de patrimoine; bilancio, stato patrimoniale; balance sheet, statement of financial position.
- Explanations: Definition and purposes of balance sheet.

The dictionary uses the two terms *balance sheet* and *statement of financial position*, but does not refer to the relationship between them. This might be due to the fact that the dictionary was published in 2007.

Aktiven

- Fachbegriffe: Aktiven; actifs; attivi; assets.
- Explanations: Definition; classification into Umlaufvermögen and Anlagevermögen; reference to Vermögen.

Vermögenswert

- Fachbegriffe: Vermögenswert; actif, bien; attività, bene; asset.
- Explanations: Definition; IAS 1 differentiates between *kurzfristige Vermögenswerte* and *langfristige Vermögenswerte*.

Anlagevermögen

- Fachbegriffe: Anlagevermögen; actif fixe, actif immobilisé, bien de capital; attività non correnti, attivo fisso, capitale immobilizzato, immobilizzazione; capital assets, fixed assets, non-current assets.
- Explanations: Definition.

The dictionary lists the terms *langfristige Vermögenswerte* and *Anlagevermögen*, but does not inform the reader about the different conceptual systems these terms belong to within German accounting terminology.

Alcaraz Varó/Hughes (Spanish-English)

Alcaraz Varó and Hughes are well-known linguists and experts in Spanish/English legal and economic terminology.

In the foreword, the authors point out that the book's main addressees are translators. This is why the terminology translated in the dictionary is classified according to their *fields of application*, for example banking, law, finance and insurance. For the present purpose, the field of application *contabilidad* (ACCTS/CONT) is considered.

Let us now check how the terms discussed are translated in this dictionary:

• *Estado financiero:* ACCTS balance sheet; statement of financial position; assets and liabilities statement; financial statement.

It is interesting to note that the term *estado de situación financiera* used in the most recent version of IAS 1 is not shown even though the English terms of IAS 1 *statement of financial position* is proposed as a translation. Translating *estado financiero* by *balance sheet* is, at least, misleading.

• Statement of financial position: balance general o de situación.

The new Spanish term for *statement of financial position* is not mentioned.

- Balance: ACCTS balance; balance sheet
- *Balance sheet:* CONT balance de ejercicio; balance de situación; hoja de balance; balance general; estado contable; estado financiero.
- Activos: assets
- Activos no corrientes: no entry
- Activo no circulante: ACCTS non-current assets
- Activo inmovilizado o actico fijo: ACCTS fixed/permanent/slow assets, long-term operational assets, capital assets, fixed capital, fixed and other non-current assets.
- Activos corrientes: current/floating assets
- Activo circulante: ACCTS working/current/circulating/floating/quick/liquid assets.

The entries in this dictionary, again, do not provide the user with a clear picture of the terminological situation in English and Spanish.

Other information for the translator

So far, I have defined various conceptual fields and the information a dictionary should provide about these fields in order to be of use to a professional translator. There is, however, further information a translator needs in order to apply the principle of equivalence correctly. I will describe two of them in the following.

Chronology of terms

We can divide the last six years into four periods during which different regulations for consolidated statements published by listed companies apply:

- Period 1: 2004, last year before introduction of IAS
- Period 2: 2005-2007
- Period 3: 2008
- Period 4: 2009

Non-current assets/consolidated statements

One example for changing terminology is what, in today's English terminology is called *non-current assets* which had different designations over time in consolidated statements:

Period 1	<i>German</i> Anlagevermögen	<i>Spanish</i> inmovilizado
Period 2	Langfristiges Vermögen	activo no corriente
Period 3	Langfristiges Vermögen	activo no corriente
Period 4	Langfristiges Vermögen	activo no corriente

Non-current assets/separate statements

As already mentioned, one of the characteristics of the new Plan General de Contabilidad (valid from 2008) is that it adopted a number of terms from the IAS/IFRS. In Germany/Austria, there has been no such terminological change so far.

	German
Period 1	Anlagevermögen
Period 2	Anlagevermögen
Period 3	Anlagevermögen
Period 4	Anlagevermögen

Spanish inmovilizado inmovilizado activo no corriente activo no corriente

Different legal systems

In legal translation, translations do not only translate between languages, but between legal systems. This is of particular importantance for languages spoken in different countries, for example German which is spoken in Germany, Austria and Switzerland. Spanish is shared by even more countries and legals systems.

In order to illustrate the terminological problems arising from this situation, I compare four basic terms that appear in the consolidated financial statements of 2009 by the Spanish company Endesa and by of its Chilean subsidiary Endesa Chile in the following:

Endesa Spain	Endesa Spain	Endesa Chile	Endesa Chile
Spanish	English	Spanish	English
informe anual	annual report	memoria anual	annual report
cuentas anuales	annual accounts	estados financieros	financial statement
balance de situación	balance sheet	estado de situación	statement of
		financiera	financial position
memoria	notes	notas	notes

This comparison shows differences even in the most fundamental terminology of accounting between the different countries. In particular, the different usage of *memoria* in Spain and Chile are noticeable.

A translator preparing the texts also for a Latin American audience must take these differences into account. Consequently, a dictionary that specialised-language translators may consider as reliable must contain information about legal systems and differences between them.

Here, looking at the entry of *memoria* in the dictionary by Alcaraz Varó/Hughes might be interesting:

 Memoria: memorandum; statement; report; S. informe. [Exp: memoria annual (COM, FIN annual report, annual financial report, company report), memoria annual de la sociedad (COMP LAW chairman's report, directors' report; S. informe del presidente del consejo de administración), memoria económico-financiera (COMP LAW financial statement; S. estado financiero).

The dictionary does not mention that in Spain, *memoria* is the equivalent to English *notes*, that is, one of the elements of a complete set of financial statements.

Conclusions

In specialised language translation, it is essential that the principle of functional equivalence is applied. Consequently, it is of utmost importance that conceptual fields are not studied in isolation, but in the contexts of the terminological structures of the relevant fields.

For the purpose of translating accounting texts from Spanish to German and vice versa, I have distinguished between three conceptual systems:

- IAS/IFRS
- National systems (Austria Germany: UGB/HGB, Spain: Plan General de Contabilidad)
- Terminology used in practice.

In order to show how these terms are used in practice, I have examined annual reports of a number of German/Austrian and Spanish companies and have identified terminological differences between them in their consolidated statements and their separate statements. The terminology actually used by the companies deviated from the rules set out by the European and the national legislators.

When doing a translation, the translator must be aware of the terminological particularities of the relevant conceptual fields if the principle of equivalence is to be respected in the translation. Consequently, specialised dictionaries should provide the translator with the necessary reference to the conceptual fields associated with the concepts.

In order to test whether this is already common practice, I examined different dictionaries for their translations of specified terms. The finding here was that although the dictionaries are generally well prepared, not a single one contained all the information a translator requires for a correct translation. Furthermore, information on terminological changes and on different legal systems between different countries are required by the translator. These were also not included in the dictionaries. However, while all this information would be desirable for a translator to access in a single dictionary, this is not possible due to constraints in space and because of the sheer amount of information dictionary writers would have to acquire when preparing the dictionary.

References

Alcaraz Varó, Enrique / Hughes Brian. 2008, Diccionario de Términos Económicos, Financieros y Comerciales. Barcelona: Ariel.

Arntz, Reiner / Picht, Herbert / Mayer, Felix. 2009, Einführung in die Terminologiearbeit. Hildesheim/Zürich/New York: Georg Olms Verlag.

Becher, Herbert J. 2008, Wörterbuch Recht, Wirtschaft, Politik. München: C.H. Beck.

Constans, Anselm (Coordinador). 2010, Plan General de Contabilidad. Barcelona: Profit Editorial.

de Groot, Gerard-René/ Schulze, Reiner (Hrsg.). 1999, Recht und Übersetzen. Tübingen: Nomos Verl.-Ges.

Grünberger, David/ Grünberger, Herbert. 2005, English for Accountants. Wien: Linde. IFRS/IAS-Portal; Online in Internet: <u>http://www.ifrs-portal.com</u> [Cited: 30/09/2011].

Koller, Werner. 2001, Einführung in die Übersetzungswissenschaft. Wiebelsheim: Quelle und Meyer.

Nandakumar, A./ Ghosh, T.P./ Mehta, Kalpesh J./ Alkafaji, Yass A. 2010, Unterstanding IFRS Fundamentals. Hoboken, New Jersey: John Wiley Sons.

Pommer, Sieglinde. 2006, Rechtsübersetzung und Rechtsvergleichung. Frankfurt am Main: Peter Lang.

Schellenberg, Aldo C. 2007, Accounting A-Z. Zürich: Versus Verlag.

Stolze, Radegundis. 2008, Übersetzungstheorien: eine Einführung. Tübingen: Gunter Narr Verlag.

Stolze, Radegundis. 2009, Fachübersetzen–Ein Lehrbuch für Theorie und Praxis. Berlin: Frank und Timme.

Wagenhofer, Alfred. 2009, Internationale Rechnungslegungsstandards – IAS/IFRS, mi-Wirtschaftsbuch. München: FinanzBuch Verlag. Wulf, Inge/ Jermakowicz, Eva K./ Eiselt, Andreas. 2010, International Financial Reporting Standards Wörterbuch/Dictionary. Weinheim: Wiley-VCH Verlag.

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