
VdÜ / A*dS / IGÜ – OPEN LETTER ON THE EU AI ACT

Contents:

We are demanding the regulation of generative AI
What Is Literary Translation?
What Are Language Bots?
How is the Sustainability of Our Profession Threatened – and What Are the Broader Implications?
MANIFEST FOR HUMAN LANGUAGE

Dear German and Austrian representatives to the EU,
ladies and gentlemen,
dear readers,

Literary translators are already experiencing how the automation of intellectual work and human language affects their field and society as a whole: both art and democracy are under threat. We, the literary translators' associations of Germany, Austria and Switzerland, along with our supporters, warn against these developments and urgently request remedial measures.

In our view, text-generating artificial intelligence is a technology that poses a systemic risk, and strong regulation is absolutely imperative. Thus, we are demanding:

1. The regulation of generative AI:

- No language automation without transparent operating principles and training data.
- AI developers must clearly state which copyright-protected works have been used during training.

2. Protection for intellectual property rights:

- No AI training with our works against our will.
- No KI training using our input without adequate compensation.

3. Transparency and co-determination:

- No AI-generated book content except by mutual agreement between publishers, authors and translators.
- Mandatory labelling of pure AI-content.

4. Targeted support for cultural work:

- Only human creators and works should receive literary funding.
- No promotion of technologies that aim to replace, rather than support, human creativity.
- The cultural technique of literary translation must be preserved and reinforced to ensure that the creation of world literature can be sustained.

5. Empowerment of Readers:

- Human translations must be clearly identified; translators must be named on the book cover.
- Governments and civil society have the obligation to promote critical language skills and technological literacy.

6. Responsible resource use:

- The environmental footprint of AI software cannot be ignored.

7. Fair labour conditions in the digital world:

- All people working on and with AI require ethical labour conditions and adequate pay.

What Is Literary Translation?

Literary translation promotes understanding between people with different ways of life and world views. The world really does look different in each language – and in the individual voice of each author. A literary translation is not just a transformation of these voices, it actively creates meanings, relationships and new language worlds, subverts familiar perspectives and conveys unfamiliar experiences. Translators are experts for exploration and empathy. For hitting just the right note. For stylistic diversity, cultural specificity, the history of different countries' literatures and the genres and fields of knowledge in which each work is embedded.

A translation is the product of an individual approach to the original. The translator must answer for that approach, not only in their own name, but in the name of the original author. And that creative process takes experience and training. The structure of a sentence and the way it focuses the attention guides the reader's inner experience. The sound of the words shapes the work's aesthetic effect and the "space" that authors and translators share with their readers. The substance of what is said and the quality of the research behind it can change our perspective on the world, on history and other human beings. The language skills that this process requires are formed and honed in the act of writing. The recreation of a literary work in another language makes translators into authors of a new work.

What Are Language Bots?

We welcome technological tools that aid active creative work, but it is cause for deep concern when they crowd out or devalue this work. Text-generative AI systems merely simulate human language. They have no thoughts, emotions or aesthetic sensibilities; they have no sense of truth, no experience of the world and no reasoning behind their translation decisions. They "write" or "translate" by using statistical probability to assemble sequences of words from gigantic databases. Due to their design, language simulations are often illogical and full of gaps; they "hallucinate", incorporating bogus terms

and claims that appear superficially plausible. AI systems are unable to cope with nuances of terminology; recognize allusions, assonance or wordplay; or interpret the tonalities of literary voice. Their outputs require often-intensive editing, leaving less rather than more time for creative work.

AI products are promoted with the implication that AI can work, “understand” and “learn” autonomously. This erases from view the vast amounts of human brainpower that underpin supposedly “intelligent” products: these chatbots were created by “scraping” millions of pirated copyright-protected works from illegal “shadow libraries” (and even private e-mails, as in the case of Gmail), whose high quality makes them sought-after as linguistic raw material. Moreover, thousands of often-forgotten “ghost workers” in low-wage countries labour under unacceptable conditions to filter out discriminatory, violent or obscene content from the random mass of data. At the same time, the brainwork of the users themselves is exploited. Whoever uses the free versions of chatbots or translation software in default mode supplies the developers with all their uploaded texts, preferences and user data, thus training the software models free of charge – because AI systems have a perpetual need for human input in order to function.

AI is not genuine intelligence, which entails emotional, moral, social and aesthetic intelligence as well as practical reason and the experience of embodiedness and movement. In this sense, the technological development of language bots cannot be described as “progress”. At the same time, though, it has given rise to the greatest concentration of data, capital and power in human history – a highly problematic situation, not just in political terms. AI systems are ravenous consumers of energy; in many ways, the sustainability of these systems is questionable.

How is the Sustainability of Our Profession Threatened – and What Are the Broader Implications?

AI has already infiltrated many translation fields, with translators increasingly hired as mere “post-editors” of machine output – work that requires, on top of their usual skills, an alertness for typical AI-errors. “Increased productivity” is fetishized at the expense of quality, creativity and decent working conditions. In light of these developments, a sense of insecurity, mistrust and resignation is spreading among literary translators as well. If the literary sphere is further affected, we must fear for the cultural mission of literary translation and the very future of our profession.

When technologies, rather than people, take centre stage, we are reduced to mere operators of machines. It is we and society who will bear the costs for language decay and social upheaval, while AI corporations pocket the profits. Among other repercussions, the literary translation profession could suffer from brain drain and go into decline. That would mean the abandonment of a cultural technique based on exploring all the nuances of language and enabling people to encounter each other and share experiences through literature. Funding and training structures would be imperilled; translators would be unable to pass on their skills and knowledge. Networks and institutions would cease to function, and translators’ intimate knowledge of international literary scenes would no longer be tapped – with dire consequences, especially for smaller languages.

Human language is a fragile and easily exploited thing. When machines simulate human language, not only can they be misinterpreted as thinking beings, they can be actively deployed to manipulate politics and world events. And a world view based on the notion that machines can simulate humans harbours the danger of treating humans like machines.

MANIFEST FOR HUMAN LANGUAGE

LITERARY TRANSLATORS AND AUTHORS ON THE USE OF AI-MODELS AND CHATBOTS

- 1) Human creativity, sensory experience, individuality, empirical knowledge and the urge to communicate are essential to living language and cannot be broken down to predictable calculations.
- 2) Text-generative AI aims to make human and machine language indistinguishable; thus, it is designed as a replacement for human skills, not as a tool.
- 3) Bot language merely reproduces the status quo. It multiplies biases and inhibits creativity, the dynamic development of languages and the acquisition of language skills.
- 4) Machine translation systems are based in part on the unauthorized, uncompensated and untransparent use of copyright-protected works, i.e. on intellectual property and human skills developed through years of life experience and education.
- 5) Machine language deceives readers about authorship and claims to truth. In the context of AI systems, the term “translation” is used for a form of machine language with no person behind it, completely unrelated to the exacting, thoughtful, responsible work that goes into a human translation.
- 6) Among other repercussions, this harms the literary ecosystem in and from which language creators live, organize education and intellectual exchange and further develop the knowledge and science of translation. And it harms the production of world literature, because world literature is created by translators.

A*dS – Autorinnen und Autoren der Schweiz (Swiss Authors’ Association)

IGÜ – Interessengemeinschaft von Übersetzerinnen und Übersetzern literarischer und wissenschaftlicher Werke (Austrian Association of Literary and Scientific Translators)

VdÜ – Verband deutschsprachiger Übersetzer/innen literarischer und wissenschaftlicher Werke (German Literary and Scholarly Translators’ Association)

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