AVTE Statement on Generative AI

Due to the increasing use of generative AI in many industries and for a variety of highly creative tasks, we at AVTE (Audiovisual Translators of Europe) have decided to issue our own Statement on AI regulation.

Audiovisual translation is a form of creative writing, so AVTE here follows the path already traced by creative authors' associations such as CEATL, SAA and CISAC. We also refer to our previously published AVTE Manifesto on Machine Translation.

AVTE is not against new technologies per se. They can benefit translators, as long as they are used for improving human output and making our work more ergonomic and efficient. What we are against is the theft of human work, the spread of misinformation as well as unethical misuse of generative AI by translation companies and content producers.

We understand that LLM-based products and technologies can be leveraged for a wide variety of applications, such as internal metadata management, terminology/glossary management, translation memory enhancement, and so on. Our immediate concern is the use of generative AI in machine translation (MT) engines, which utilises massive amounts of data (Large Language Models) to predict the next word in a sentence based on the context provided by the preceding words. Of course this is not a meaning-driven or purpose-driven translation like one done by a human.

And yet, in the audiovisual translation industry, it is increasingly seen as an adequate substitute for human translation. Or, rather, it is deemed sufficient for the human to act as a mere supervisor who patches up AI-generated machine-translated audiovisual contents (machine translation post-editing or MTPE) in order to lower costs and raise production volume.

Below, we describe from an insider perspective how post-editing machine-translated text is more of a hindrance than a help and nearly always leads to inferior results.

We'll tackle the issue from four different but intertwined standpoints:

- The technical standpoint concerning the suitability of AI in audiovisual translation, with a focus on some widespread misconceptions about MT;
- The perspective of sustainability for the whole audiovisual translation industry;
- The legal standpoint of author's rights issues;
- The ethical standpoint of the impact on society.

Technical standpoint

1. Translation is a form of creative writing that must take into account the cultural, social and historical context of both the text and the reader, as well as the idiosyncrasies of the characters, humour, tone, intertextuality, and the intent of the author, to ensure the message is properly conveyed. Generative AI lacks this fundamental skill of contextualization and judgement. Many Language Service Providers argue that the practice of human post-editing bridges this gap satisfactorily. In our experience as insiders working directly with the machine translation output, it is rarely the case, as detailed below.
2. Audiovisual translation is intrinsically less suitable than other forms of translation for the use of AI because it requires the human ability to discern extra-textual elements, such as sounds and images, which AI still can't interpret to any meaningful extent.
3. Audiovisual translation often deals with creative works which strive to be unique and original. Their translation, too, should be original and unique. Generative AI doesn't come up with original concepts by itself. Instead, it re-elaborates existing (possibly copyrighted) materials, making artistic works less and less original. This goes against the best interests of the original authors.

Machine Translation Misconceptions

1. There is a widespread narrative that generative AI makes the translators' work faster, easier and better. It is a common misconception that a machine translation only requires human translators to make minor changes.
   Having as a base a text pre-translated by an unthinking machine doesn't spare the translator from the most demanding and important effort: understanding and conveying the message in its multiple components of context, scope, intended meaning, target audience, sources, etc.
2. Taking this cognitive effort into consideration is not economically productive at post-editing rates. This is why most time AI-generated, post-edited content is devoid of clarity, direction and efficacy of communication, basically, of quality. While someone translating from scratch will focus on rendering the content in the best possible way, someone post-editing a machine-generated text will mostly try to make the text formally 'marketable' in the most time-efficient way possible, regardless of substance or usability.
3. Hagström and Pedersen's 2022 study [“Subtitles in the 2020s: The Influence of Machine Translation”](#) shows how relying on machine-generated text for translation dramatically increases errors of meaning, style and general readability. Even when they are accurate, machine-translated texts are poorly written, and being exposed to bad writing can be detrimental to the writing skills of both post-editors and end users.

Industry standpoint

1. Audiovisual translators are willing to integrate new technologies in their workflow as they have been doing for decades (e.g., with subtitling software, online dictionaries, spell checkers or CAT tools), on the condition that they are used for improving human output, which is clearly not the case for the proposed applications of generative AI in translation. As experts in the field, translators should always have the final word in determining if a tool is suitable or helpful for each particular task and use it or not as they see fit.

2. AVTE doesn't condone the use of human translators as mere supervisors for machine translated audiovisual works, and we firmly denounce the idea that AI output only needs a few quick tweaks to be adequate. Such a narrative has been pushed onto audiovisual translators to make a dramatic decrease in remuneration seem inevitable, turning a blind eye to the staggering drop in quality.

3. The [AVTE Machine Translation Manifesto](#) has already made several suggestions for the industry: involving translators from the start in the development of translation technologies, implementing more refined QA checks, improving predictive typing, voice input and voice recognition to speed up the work for real and cover typical human blind spots (like detecting typos, oversights and inconsistencies, performing repetitive tasks with precision, quoting verbatim, searching instantly through data); generating enriched data, searchable databases from trusted sources and always up-to-date dictionaries, experimenting with various options to improve style and accuracy, etc.

4. With more and more translators being downgraded to post-editors, fewer and fewer people will want to undertake audiovisual translation as a profession. Consequently, the supervision of generative AI output will fall on untrained workers, probably as a part-time job to top up the wages for their main job (because the remuneration most LSPs offer for this service is too low to earn a living, sometimes equating to a third of what they used to earn as translators). This, coupled with generative AI starting to feed on its own generated content, will lead to a lower quality, rendering the output useless in the long run. Instead, for the sector's long-term sustainability, translators should receive not only a living wage, but one that reflects their skill and experience.

5. Being exposed to badly written works affects the writing skills of the reader. This means translators being exposed to machine-translated works will result in them producing translations of lesser quality. This is also intertwined with the concept of "light MTPE", where translators are instructed to just fix blatant errors instead of producing quality output so that they can be paid even less. This could as well be part of a long-term business strategy where consumers and audiences are presented with more and more mediocre texts so that they get used to them and stop demanding quality, and translators can be totally or almost totally disregarded.

6. Provided that there will ever be an ethical way to use generative AI without exploiting anyone or violating their rights, and provided this new, ethical AI becomes a game-changer in the industry, dramatically contributing to improved profits, AVTE considers the following scenario.
   Due to the translators' role in AI training (training that in no case should happen

without their consent) and their accountability for the final output, given that such output is paramount in the development of AI and could indeed determine the success of a particular AI engine over the competitors and result in incalculable profits, translators should reap a portion of those profits. This model should be properly regulated through an internationally consistent approach of regulatory bodies supported by collective management organisations (CMOs) or licensing agreements that grant the weaker party a more equitable repartition of profits and opt-out clauses.

Legal standpoint

1. Purely AI-generated products presented as artistic creations cannot come under current author's rights law. AVTE believes that every legislation should preserve this principle. Otherwise, a massive amount of copyrighted material will be concentrated in the hands of the few players who can afford to employ generative AI technology. Requiring human authors to harness author's rights would also mitigate numerous risks like mass layoffs, drying up of creative professions, and the flood of inaccurate, biassed and otherwise unchecked output consisting of machine-generated content.
2. Regarding the audiovisual translation industry, AVTE feels the need for regulations that prevent companies from exploiting loopholes in author's rights laws by using dummies to sign off on unreviewed AI output.
3. On the topic of translations of works covered by author's rights, the translated version of the work should avoid with the utmost care to infringe the rights of other authors, copyrights and other intellectual property rights. Currently, generative AI poses many problems in this respect: other than using data sets containing copyrighted material, it could unpredictably regurgitate content infringing author's rights.
4. Relying on the principle that AI should serve human creativity and not replace it, we strongly believe that no public funding should be allocated to generative AI publishing and translation projects.
5. A final requirement to safeguard the rights of all stakeholders, as well as prevent machine translation's quality issues from devaluing the translation profession, concerns transparency at all levels:
   a. Machine translation post-editing is cognitively more demanding than proofreading, therefore proofreaders have the right to know if they're working on a machine-translated output before accepting the assignment. Misleading a proofreader to make them work on a machine-generated audiovisual translation at the same standard price as working on a human-made one is unethical. The rate for machine-translation post-editing, if anything, should be higher than the usual review rate.
   Also, whenever the work of a translator or proofreader is used to train a machine, there is an economic gain for the engine owner. Hence, the company should inform the translator or proofreader that they are training AI with their work and give them a choice to either negotiate a supplementary price or opt out;
   b. The party commissioning the audiovisual translation has the right to know if

they're paying for a human-made translation, an MTPE or a full machine translation. Leading clients to believe human translators will take care of their works and then sell them machine translations is unethical and in bad faith, even more so if the output is used to train the machine without the client's authorization.

    c. The end users/viewers have the right to know when the audiovisual works they're presented with has been automatically generated by AI or crafted by a human being. This way, they will have more elements to judge the trustworthiness of the work.

Ethical standpoint

The proliferation of AI-generated content has significant social implications.

1. As long as the AI algorithms favour works that are more palatable to audiences from developed countries, there is a distinct risk that such a cultural hegemony erases the unique qualities of other audiences. Or, by fostering cultural homogenization through the lenses of mainstream culture, AI may promote harmful biases.

2. The same algorithms dictate what to produce based on commercial appeal, making it more difficult for genuinely original or non-mainstream ideas to emerge, to the detriment of creativity, diversity and individuality.

3. Some propose a compromise in which audiovisual machine translation would be confined to lowbrow entertainment, such as reality shows, daytime soap operas, etc., while high-calibre titles would still be handled by experienced linguists. The same line of reasoning has been proposed for literature. On this topic, CEATL warned against the dangers of discriminating certain book genres as less deserving than others. We believe the same applies to multimedia works.
Even leaving aside the fact that translating orality, idiosyncrasies, intertextuality, pop culture, and dialogue overlap so typical of reality shows requires deep expertise, such distinction shows intrinsic bias and elitism: who is to decide on the value of a cultural product?
If lowbrow entertainment will get low-quality linguistic treatment, those who partake in such works mostly or exclusively will miss a valuable opportunity to develop linguistic and critical thinking skills through media. Not to mention that people raised in low-education, low-income settings typically have less access to highbrow entertainment. By feeding them poorly translated works, we widen the divide between the privileged and the disadvantaged.

4. All of the above will eventually impoverish our cultures, our writing abilities and language itself. A widespread use of AI will get everyone used to mediocrity and put at risk the creation and the passing on of cultural heritage. This phenomenon will worsen when generative AI goes from learning through human examples to learning from its own output (self-pollution).

5. Should raw AI-generated content become copyrightable, there is the risk that the handful of wealthy players who can afford to employ AI would hold the rights to an incommensurable amount of material, stunting the development of individual creators.

6. By the same low-cost mass-producing mechanism that essentially reduces art to a

made-to-order commodity, generative AI threatens unfair competition with human authors, who will be less and less inclined to engage in a creative career.

7. Finally, while generative AI is presented as a fast, cheap and accessible solution for end users, we must not overlook the massive energy consumption it demands, its impact on the environment, and the exploitation of "microworkers", humans (often from poorer countries) undertaking repetitive, low-paid tasks to train the artificial intelligence. In this frame, AI may not be as cost-efficient as humans in creating and translating works for the entertainment industry. It would be wiser to reserve AI's potential for more pressing and humanitarian pursuits like improving healthcare, scientific research and mitigating economic inequality.

Using AI for creative translation is a mock solution to a non-issue that only seeks to save money for the middlemen while compromising the livelihood of professional translators and offering audiences subpar products. It must be taken into consideration that, according to the [UNESCO Courier](), the cost of multilingual audiovisual translation usually represents less than 1% of the budget for film production, while its internationalisation grants approximately 50% of the profits.

Language is what makes us human. We hope that the audiovisual industry will choose to value the deep cultural contribution of human translators, instead of blindly chasing the mirage of a technology that, if used extensively, would make us all less and less human.