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## The Directorate-General for Translation's gender-neutral English guidelines (1998-2022)

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### Abstract

Ten years before the European Parliament adopted the *Gender-neutral language in the European Parliament* multilingual guidelines (2008), the European Commission's Directorate-General for Translation had already included a section on this subject in the third edition of its *English Style Guide* (1998). The original text was later reproduced in other European Union's style guides, namely the *Interinstitutional Style Guide*, the *European Commission Style Guide* and the ephemeral *European Commission Guidelines for Inclusive Communication*, withdrawn shortly after publication due to political and religious complaints. After a quarter of a century, the guidelines have drifted apart through their respective updates. What are the exact inconsistencies of the current style guides? How do the changes reflect developments in the field of inclusive language? And do the guidelines include gendered terms and expressions relevant for EU linguists? A unified EU policy on linguistic sexism across its languages and institutions expressed in a set of relevant and coherent language guidelines seems vital to enabling and fostering the implementation of non-sexist language as a gender mainstreaming tool in the EU.

### Key words

Directorate-General for Translation, EU, gender-neutral language, style guides, institutional translation

### 1. Introduction

Institutional translation is a regulated activity subject to a strict process of quality management. This includes the use of tools such as style guides, data bases, memories, translation software and workflow management (Koskinen, 2008; Biel, 2017), and the verification of compliance and of client's satisfaction through a necessary exercise of evaluation (Martínez & Montero, 2010). Institutional translation quality is expressed as standardization and coherence through reference to a common rule (Arevalillo Doval, 2004). The interrelation between guidelines and quality in institutional translation is such that the number of policies and guidelines can be linked to an improvement in quality (Biel, 2017). However, although a plethora of reference materials may well display a serious commitment to quality management and assurance, the probability of inconsistency in guidelines as a result could be detrimental to quality (Drugan et al., 2018) and could indeed pose an additional challenge for translators. In a study of DGT manuals and style guides, Svoboda (2017, p.76) found "enormous divergence among language departments both in the topics covered by translation manuals (TMs) and style guides (SGs) as well as in the level of detail of such resources". Inconsistency can hardly benefit standardization and normativity, which are distinctive features of institutional translation (Svoboda et al., 2023), since "high

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precision, interlinguistic concordance and intertextual consistency are translation priorities in ensuring the reliability of international and supranational law” (Prieto Ramos, 2021, p.178), and this is achieved through style guides and other tools (Koskinen, 2008; Schäffner et al., 2014).

In the EU, translation quality management fulfils the role of reinforcing the equivalent status of all the institution’s official languages (EU, 1958), due to the fact that translated documents are considered originals with equal legal effects.

The study of guidelines in institutional translation has for the most part been theoretical as an element of quality management, but compliance has seldom been targeted. One recent exception is Wasilewska’s (2021) empirical study of adherence to the EU’s Polish style guide, in which detailed directions were found to be disregarded by translators. This lack of compliance was attributed to a combination of the following factors: “time pressure, required consistency, the use of translation memories, translators’ habits and a high volume of instructions” (Wasilewska, 2021, p.83).

For the European Commission’s Directorate-General for Translation (DGT), quality is a key concern, a duty, a requirement and a competitive advantage (DGT, 2009b), and in practical terms it is described as fitness for purpose:

A translation is fit for purpose when it is suitable for its intended communicative use and satisfies the expressed or implied needs and expectations of our direct customers (requesting DGs), our partners in the other EU institutions, the end-users and any other relevant stakeholders. Consequently, fitness for purpose means high quality in the abovementioned sense. It should not be mixed up with the good-enough quality concept used by the software industry and in the machine translation context. (DGT, 2015 cited in Strandvik, 2017, p.129)

Among the materials used in translation quality management, language-specific style guides are practical tools that set the preferred choices to be used by the EU’s internal and external writers and translators. The problem arises when instructions are not only abundant but also inconsistent. This is the case of non-discriminatory language guidelines targeted at EU linguists. Despite the EU’s standardization efforts, its gender-neutral language guidelines are for the most part restricted to English and can vary enormously in content, scope and enforceability between languages and institutions, with some official languages not having any relevant directions at all (López-Medel, 2021b).

Nevertheless, in the 24 years since the publication of a dedicated section in the DGT’s *English Style Guide* in 1998, English-specific gender-neutral language guidelines have become broadly accepted in the EU. This can be seen in their integration in style guides as a form of endorsement, in contrast with other official languages, and their strategy has evolved from a non-sexist focus via gender specification to gender neutralization and a broader non-discriminatory approach, encompassing minority groups that tend to be excluded from language. This, in the case of the EU, can include non-standard abilities, ages, religions, ethnicities and sexual orientations.

With regard to the specific strategies of the portrayal of gender in language, English guidelines as a whole tend to promote neutralization (the replacement of both masculine and feminine genders with neutral) as opposed to specification in other official languages, such as French, German and Spanish (Teso, 2010). Gender specification involves the use of feminine gender for women for the sake of disambiguation and visibilization, and can be combined with neutralization when stating the gender is not considered relevant.

Inevitably, inclusive, gender-neutral and non-sexist language takes different forms depending on the distinctive expression of the genders in each language, although some of their features can be common, like the avoidance of the use of masculine gender by default, the placement of masculine gender first, or the belittling of women with respect to men, such as when referring to a woman’s married status (*Mrs*). For the purpose of this study, we will focus on semantic gender, which refers to the sex of a person, as opposed to grammatical gender, which is not related to physical attributes.

## 2. Methodology

A diachronic study allows us to observe the evolution of the DGT’s gender-neutral language guidelines over four decades (1998-2022). Its mixed, quantitative and qualitative design includes a description and comparison of four style guides that originally contained subsequent versions of the same text (DGT, 1998). Also, an analysis of relevant corpora reveals the degree of implementation of

the guidelines. With the help of an online corpus manager (Sketch Engine), the examples in the guidelines are located and analysed from a gender perspective. The corpus chosen for the analysis contains over 74 million tokens and almost 4 million documents sourced from the DGT Translation Memory, made up of EU legal documents and available as parallel corpora. In institutional translation, the diachronic study of style guides is important as an “invaluable account of a translation team’s deliberations and choices over time” (Svoboda, 2017, pp.104-105), can help understand the processes and products of this discipline, and single it out from others within the field of translation studies (Svoboda, 2017). In this case it will also outline the EU’s language policy’s journey towards gender neutralization in one of its 24 official languages.

As a corpus-based study, its methodology starts with the definition of the corpus, tools and theoretical platforms (Calzada Pérez, 2017) and continues with the preparation of a methodological protocol. The main advantage of this is “the potential to reduce speculation and verify research hypotheses systematically on more extensive data” (Biel, 2018, p.26). The approach is interdisciplinary and encompasses (institutional) translation studies and gender studies. The feminist methodology used, described by Luxán Serrano and Azpiazu Carballo (2016) can be seen throughout the design of this research, from the selection of the subject (guidelines on gender-neutral language) to the goal of the study, which is to describe the content of the style guides, their estrangement and the relevance of their instructions against the corpus.

Once the first style guide (ESG) has been dissected, we can follow its evolution through consecutive editions, focusing on the changes made. Then, the ensuing three style guides (ISG, ECSG, ECGIC) are described, both in context and in scope, and their gender-neutral language directions are analysed in the light of the original guide. Thereafter, all four guides are merged into one set and their specific directions confronted. Three of them still contain the original instructions in slightly different versions (ESG, ISG, ECSG) and they are all but one restricted to the European Commission (ISG is EU-wide).

The analysis of the style guides will highlight the evolution of their content and their mutual inconsistencies over time. How have the EU’s gender-fair language guidelines evolved and does this reflect a development in their approach? How do they justify and express non-sexist language? Do they challenge the use of masculine as a default gender? And is their emphasis put on making women visible in language or in neutralizing the genders? Finally, how could those choices affect other languages, considering that the main combination of EU translations has English as source language?

From a more practical standpoint, are the guidelines really relevant to EU linguists? Do they encounter those terms and expressions during their work? Or do the guides contain generic instructions for content that is not in fact present or significant? A study of a large, relevant corpus can test the pertinence of the guides’ instructions and their examples with regard to real texts.

### 3. Selection of the style guides

For the following analysis, four EU style guides have been chosen that originally contained the same text (DGT, 1998). Since the scope of these style guides is broader than gender-neutral language (their directions apply to English drafting and/or translation in the DGT or the EU, or to the area of inclusive language), only their sections devoted to gender-neutral language will be examined.

Table 1. Guidelines studied

Created	Updated	Title	Body	Target audience	Compulsory	In force
1982	2022	<i>English Style Guide</i> (ESG)	Directorate-general for Translation, European Commission	Authors and translators in the EC	Yes	Yes
1997	2022	<i>Interinstitutional Style Guide</i> (ISG)	Steering Committee of the Publications Office, European Union	All those involved in document production	Yes	Yes

Created	Updated	Title	Body	Target audience	Compulsory	In force
2019	2020	<i>European Commission Style Guide</i> (ECSG)	Secretariat-General, European Commission	Internal use of the EC staff	No	Yes
2021	-	<i>European Commission Guidelines for Inclusive Communication</i> (ECGIC)	Equality Coordination, European Commission	All Commission colleagues	No	No

Only ECGIC is devoted entirely to inclusive language, while the others include sections on gender-neutral language in their current editions but contain directions for drafting and translation in general. ECGIC is not currently in force.

As a sign of their importance, two of the style guides (ESG and ISG) are included in the European Commission's list of resources with general EU and language-specific information for contract translators into English (EC, 2022), perhaps the most exhaustive and complete (Svoboda, 2017). Other resources listed are IATE, the EU's and the European Parliament's glossaries, Termcoord, N-Lex, and the DGT multilingual translation memory, among others. Some style guides on the list are exclusively for contractors working for the European Commission and, as such, are not meant to be valid for other EU institutions or intended for inhouse translators or writers. Also, internal style guides do not appear in the list, such as ECSG or the former internal ECGIC. Unless noted otherwise, the latest editions as of writing this piece are discussed (EC, 2020; EC, 2021; DGT, 2022a; EU, 2022).

The DGT's original *English Style Guide* (ESG) (DGT, 2022a) text on gender-neutral language has been reproduced in at least three other guides: the *Interinstitutional Style Guide* (ISG) (EU, 2022), the *European Commission Style Guide* (ECSG) (EC, 2020) and the *European Commission Guidelines for Inclusive Communication* (ECGIC) (EC, 2021). Of all of them, the *Interinstitutional Style Guide* stands out as a higher-ranked and enforceable document whose guidelines "prevail over any other solution proposed elsewhere or used previously" (EU, 2022, p.7). It must be noted that the use of style guides "is considered the most widespread strategy for the implementation of gender-based language reform" (Teso, 2010, p.36).

The compulsory nature of the guidelines studied here depends on the style guide in which they have been included and range from recommendations (ECGIC, ECSG) to obligations (ESG, ISG), despite the tendency of gender-neutral language guidelines to not be prescriptive (Teso, 2010).

### 3.1 English Style Guide (1982-2022)

The *English Style Guide* (ESG) was created in 1982 and is now in its 8<sup>th</sup> edition, last updated in July 2022 (DGT, 2022a). It is accompanied by a chronology of changes to the guide and the *Country Compendium* (with information relevant to EU member states and other countries) titled *What's new* and updated also in July 2022 (DGT, 2022c).

ESG is listed in first place in the resources' website for EC's contractors, establishing its superiority even over the *Interinstitutional Style Guide*, which appears in second place. ESG is described there as the "DG Translation in-house style guide" (EC, 2022).

It is a manual for in-house and external EC staff responsible for English drafting and translation, and its guidelines affect all types of texts, even those of a legal nature and intended for publication (DGT, 2022a).

Its first edition (DGT, 1982) did not include gender-neutral language directions, which were introduced sometime in the 1990s. The exact date could not be determined since digital registers only go back to the year 2000 and the oldest printed copy in the department which already includes this section dates from 1998. Therefore, the section could have been created anytime between 1983 and 1998. To be safe, we will work with 1998 as the earliest confirmed year of publication of gender-neutral language content in ESG.

At first, the gender-neutral language guidelines were part of a section on correspondence and then in 2004 (5<sup>th</sup> edition) an entire new section was created. Since then, the content has been revised and

extended several times. In 2019, the gender-neutral language section was inserted in an inclusive-language section with other non-discrimination strategies. The original text was the basis for the mirroring sections in ECSG and ISG.

*Table 2.* Reverse chronology of changes to the ESG’s gender-neutral language guidelines

<b>Edition</b>	<b>Revised</b>	<b>Section</b>	<b>Change</b>
8 <sup>th</sup>	July 2022	15.1	<i>themselves</i> as a non-binary pronoun and <i>themselves</i> for singular nouns
8 <sup>th</sup>	May 2021	15.1	Use of gender-specific pronouns. Example of the singular use of <i>they</i> ; <i>he or she</i> is no longer recommended
8 <sup>th</sup>	May 2021	15	Purpose of the guidelines for publication and the treatment of offensive language
8 <sup>th</sup>	January 2021	15.3	<i>fishers</i> instead of <i>fishermen</i>
8 <sup>th</sup>	November 2020	15	Alternatives for <i>in layman’s terms</i>
8 <sup>th</sup>	October 2019	15.1	Avoid <i>chairman</i> , <i>man-made</i> , gender-specific pronouns, and words containing <i>man</i> . Alternatives to <i>man</i> : <i>manufactured</i> , <i>artificial</i> , <i>labour hours</i> , <i>staff</i> , <i>human resources</i> , <i>to staff</i> , <i>humanity</i> , <i>the average person</i>
8 <sup>th</sup>	February 2019	15	New section on inclusive language. The section on gender-neutral language becomes 15.1. New sections: 15.2 – People with disabilities and 15.3 – Other aspects of inclusive language
8 <sup>th</sup>	December 2017	15.3	Revision and reordering of gender-specific pronouns. Priority to <i>they</i> , <i>them</i> , <i>their</i> , <i>theirs</i>
7 <sup>th</sup>	April 2015	14	Additional tips
7 <sup>th</sup>	May 2014		Different numbering
5 <sup>th</sup>	May 2009	12.4	Noun forms
5 <sup>th</sup>	2004	12	New section dedicated to gender-neutral guidelines
4 <sup>th</sup>	2002	6.14	New paragraph recommending the use of 2nd person or imperative
4 <sup>th</sup>	2000	6.12	Subsection on gender-neutral guidelines in section 6 – Correspondence
4 <sup>th</sup>	1998	-	Earliest confirmed edition with gender-neutral guidelines
1 <sup>st</sup>	1983	-	Not thought to contain gender-neutral language guidelines

Despite being a general-purpose style guide, it treats gender-neutral language directions as any others, without any justification except for encouraging their use, since “gender-neutral language is nowadays preferred wherever possible” (DGT, 2022a, p.67). Previous editions had less than one page devoted to gender-neutral language, with four main guidelines in 2009: avoid generic *he*, use plural or a neutral pronoun (*everyone*) instead of “the clumsy he/she” (DGT, 2009a, p.53), use the second form (*you*) or the imperative, and choose noun forms to emphasize or de-emphasize gender.

The current guide (DGT, 2022a) devotes 4 pages (67-70) to inclusive language of a total of 125 pages and around 3 of those to gender-neutral language (section 15.1). Over the years, references to men and women, and gender-specification guidelines have been replaced with neutral language, from 6 instances of the word *woman* in 2009, to 5 in 2016 and 1 in 2022. The neutralization process has been gradual and more pronounced in recent years, as can be seen in the following table.

**Table 3. Replacement of the words *man*, *woman*, *male* and *female* in ESG**

<b>DGT (2017)</b>	<b>DGT (2021b)</b>
[...] <i>the masculine pronouns ‘he’ etc. are used generically to include <u>women</u></i> (p.55)	[...] <i>the masculine pronouns ‘he’ etc. are used generically to include <u>all genders</u></i> (pp.65-66)
[...] <i>avoiding gender-specific pronouns for <u>people who may be either male or female</u></i> (p.55)	[...] <i>gender-specific pronouns for <u>people whose gender is not specified</u></i> (p.66)
[...] <i>nouns that appear to assume that <u>a man</u> rather than <u>a woman</u> will perform a particular role: ‘chairman’ is the most obvious example</i> (p.55)	[...] <i>nouns such as ‘chairman’ that appear to assume that a particular role is habitually performed by <u>a person of a particular gender</u></i> (p.66)
<i>Note that the terms <u>tradesperson</u> and <u>craftsperson</u> are commonly used instead of <u>tradesman</u> and <u>craftsman</u> by local government authorities advertising jobs to <u>both men and women</u></i> (p.55)	<i>Note that the terms <u>tradesperson</u> and <u>craftsperson</u> are commonly used instead of <u>tradesman</u> and <u>craftsman</u> by local government authorities advertising jobs to <u>people of all genders</u></i> (p.66)

The old-fashioned title for married women (*Mrs*) is not mentioned explicitly but stress is placed on using *Ms* “unless you know that the person concerned prefers otherwise” (DGT, 2022a, p.30), implying that some women might prefer to be called *Mrs* and must be referred to as married even if doing so is considered sexist.

The guide’s gender-neutral guidelines have as an exception the technical term *man-made fibres*, which is not subject to the elimination of the *man* particle (DGT, 2022a, p.68). This is a case where a gendered-noun language like Spanish can be less masculine since the translation of *man-made* is *artificial* (an adjective devoid of gender endings). Notwithstanding this exception, the European terminology database IATE suggests *artificial fibre* as a translation of the French *fibres artificielles*, the expression that gives name to the Bureau International pour la Standardisation des Fibres Artificielles. This contradicts the guide, which justifies the use of *man-made* based on the name of this organization. A former exception that has now been removed concerns *fisherman/fishermen*, which in 2021 gave way to *fishers* as a gender-neutral substitute (DGT, 2021a, p.66).

The main area of the ESG gender-neutral guidelines is grammatical (pronouns and nouns), followed by professions and forms of treatment. The *man* particle takes more than half of the guidelines, both with regard to pronouns and nouns denoting positions and professions. However, the stress on the *man* particle seems unnecessary if we look at the DGT corpus, where other gender-neutral alternatives are in fact more frequently used: *man-made* appears 1,545 times as opposed to *manufactured*, with 3,905 occurrences, or *synthetic*, which is not included in the guide but has 3,338 cases in the corpus; *man hours* (10) > *working day*\* (4,449); *manpower* (81) > *staff* (13,650); *to man* (64) > *to staff* (326); *mankind* (4) > *people*\* (5,638); *man in the street* (1) > *average citizen*\* (10). Alternatives with an asterisk are not included in the guide in spite of being more frequent in the DGT corpus than the expression discouraged.

Substitution is the most prevalent technique, with more than two thirds of the guidelines, followed by omission, verb reformulation and far behind, gender specification. Another recent change, following the discouragement in previous editions of the gender pronoun pair *he/she* and *his/her*, is its disappearance altogether from the examples. Since May 2021, “[T]he use of ‘he or she’ is no longer recommended as a gender-neutral alternative” (DGT, 2022c, p.8). This technique has evolved from a recommendation to not being preferred and finally disappearing. Now, the use of gendered pronoun pairs has been discarded and plural forms are preferred instead.

**Table 4. Discouragement of *he/she* in ESG since 2021**

<b>DGT (2021a)</b>	<b>DGT (2021b)</b>
<i>Publication could be delayed because <u>he/she</u> has gone bankrupt</i> (p.59)	<i>Publication was delayed by the <u>printer/printer’s</u> going bankrupt</i> (p.58)
<i>Publication could be delayed if <u>he/she</u> were to go bankrupt</i> (p.59)	<i>Publication could be delayed by <u>them/their</u> going bankrupt</i> (p.58)

The recommendation to use singular *they* has grown from one reference (DGT, 2009a) to the creation of a singular-plural form: *themself* (DGT, 2022a). In the area of singularization, the guide refers to

the dictionary, although with the added warning of not confusing “person-specific singular ‘they’” with “general singular ‘they’” (DGT, 2022a, p.68). The main difference is whether the sex of the person is unknown (second case), or if he or she has chosen to be referred to in plural.

Table 5. Pluralization and omission of singular pronouns in ESG since 2021

DGT (2021a)	DGT (2021b)	Technique
<i>His/her name appears above The President on any EU legislation adopted at the meeting (p.88)</i>	<i>Their name appears above The President on any EU legislation adopted at the meeting (p.88)</i>	Pluralization
<i>Avoid the President of the Council in reports on the meeting, however, and write either the minister presiding or his/her name, adding (President) (p.88)</i>	<i>Avoid the President of the Council in reports on the meeting, however, and write either the minister presiding or their name, adding (President) (p.88)</i>	Pluralization
-	<i>If you know that someone romanises their own name differently from ELOT, use their spelling [...] (p.110)</i>	Pluralization
	<i>In administrative correspondence, however, it is preferable to address your addressee with their title, if they have one – for example, as president of an organisation or association – rather than by their name, as you are addressing them as holder of that office or function, and not in a personal capacity (p.123)</i>	Pluralization
	<i>[...] if the person in question has expressed a preference for that spelling or spells their own name that way (30)</i>	Pluralization
<i>The chair expressed his/her/its dissent (p.67)</i>	<i>The chair expressed <del>his/her/their</del> dissent (p.67)</i>	Omission
<i>The spokesperson voiced his/her opposition to the amendment (p.67)</i>	<i>The spokesperson voiced <del>his/her/their</del> opposition to the amendment (p.67)</i>	Omission

According to a study of the use of nouns in this guide’s examples with respect to the DGT English corpus (López-Medel, 2021b), their relevancy rates are not negligible, with an 18% match rate. The coinciding nouns are, in alphabetical order: *auditor, member, officer, passenger, person, president, representative, and user*. The remaining nouns in the examples of this section are merely symbolic or directly non-existing in a corpus of 59 million words: *police officer* (91), *firefighter* (44), *craftsman* (21), *tradesman* (12), *policeman* (10), *policemen* (8), *fireman* (2), *firemen* (2), and *craftsperson, policewoman, policewomen* and *tradesperson* (0). Nevertheless, 38 of the 46 most frequent nouns in the DGT corpus are not mentioned in ESG, including *agent, consumer, employee, and individual* (López-Medel 2021b, pp.284-285).

A masculine noun that ESG urges to avoid, *chairman*, only appears 2,741 times in the corpus and is not even included in the list of the most frequent nouns. Nevertheless, the effect of this guideline, which (14 years before) left the choice of using *chairman* or a non-sexist alternative to the discretion of the writer or translator, is not evident considering that *chairperson* has 1,028 cases in the corpus (almost three times fewer than *chairman*), while *chair* appears 856 times, and *chairwoman* has no incidences at all. (The female gender option is in fact discouraged in recent editions in favour of neutral

alternatives). A more successful variant is *spokesperson*, with 105 cases versus 24 of *spokesman* (but 0 of *spokeswoman*).

The ESG text has been the basis for the corresponding sections in ISG, ECSG and ECGIC, which we will now proceed to describe.

### 3.2 Interinstitutional Style Guide (1997-2022)

The *Interinstitutional Style Guide* (ISG) (EU, 2022) represents the European Union’s efforts of terminological harmonization among its institutions, “an achievement [...] unique in its field due to the number of language communities involved in its development” (EU, 2022, p.7). Its guidelines take precedence over all others and are compulsory throughout the Union. ISG has a version for each official language and is divided in four parts: 1. *Official Journal*, 2. General publications, 3. Conventions common to all languages and 4. Publications in each EU official language. It dates to the *Vade-mecum for editors* (EU, 1981) and was published as such in 1997 (EU, 1997). As of writing this piece, the last printed version was finished in April 2022 and the website was reviewed last in June 2022. A new website environment is expected for the autumn of 2022.

As part of its continuous updates, the English version’s part four was thoroughly reviewed in April 2015 from the previous 2011 printed edition, including the addition of section 10.6 – Gender-neutral language (EU, 2015). The original wording coincided word for word with DGT (2016), including a warning about the use of singular *they* for its likelihood of being unclear, causing translation problems and not being perceived as grammatically correct (EU, 2015, p.23). The only difference with DGT (2016) was the numbering and paging (EU, 2018). The remaining 23 official languages did not follow suit and still do not include a similar section.

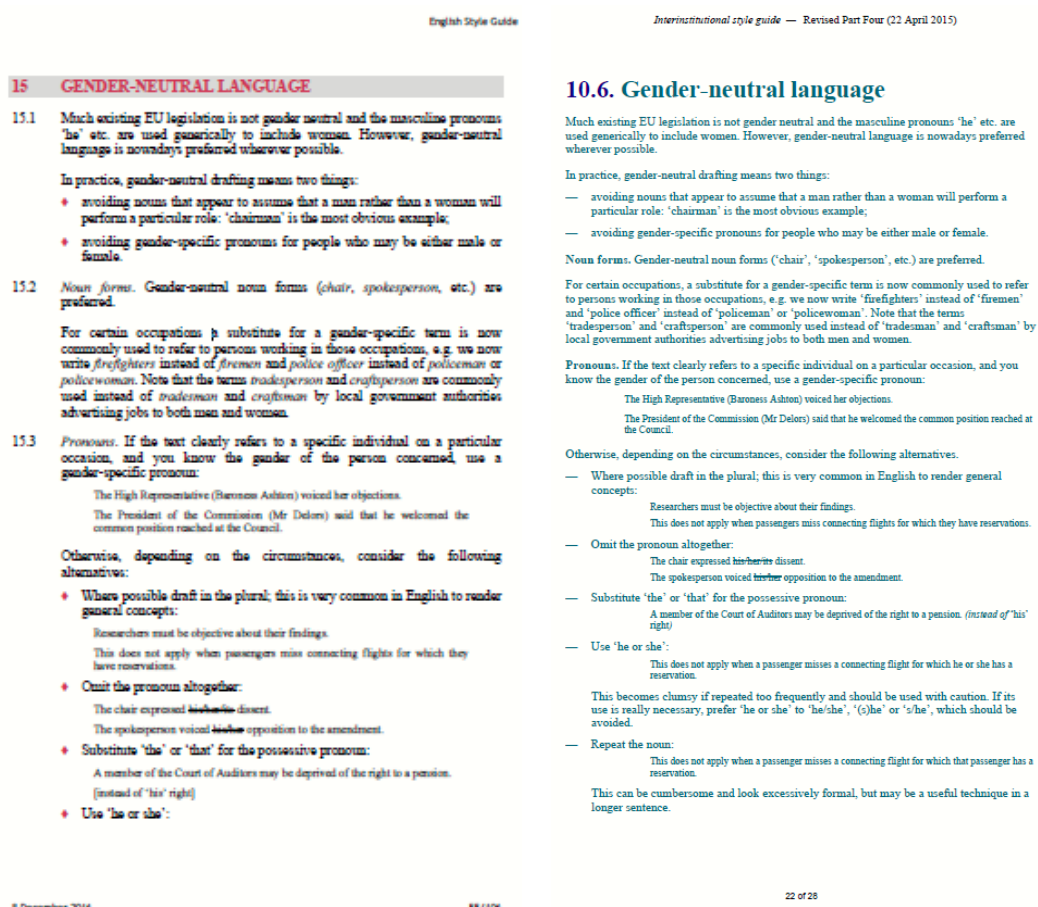


Figure 1. Side-to-side view of the exact same content in ESG (DGT, 2016) and ISG (EU, 2015)

The current edition of ISG (EU, 2022) still corresponds to the ESG from six years before (DGT, 2016), including the recommendation to use *he or she*, except for a slightly different arrangement of



the guidelines within the section. ISG does not have a larger inclusive language section either nor does it contain instructions on whether to use married women's titles. *Mrs* is listed in Annex A3, section 1, as a civil title. Nevertheless, there are 9 cases of *Mr* and only 1 of *Ms*, with 11 *he* and 4 *she* (the latter only in gender pairs, *he or she*). Finally, the use of singular *they* is not discussed in the section of verb agreement.

The inclusion of a section on gender-neutral language in the most important EU style guide, with the highest-ranking status and required to be followed in all institutions is highly significant, but as mentioned earlier, it is restricted to the specific English language version.

Since ISG's gender-neutral section has not been updated since 2016, it contains the oldest version with regard to ECSG (last revised in 2020) and ESG (updated in 2022).

### 3.3 European Commission Style Guide (2019-2020)

The *Commission Style Guide* (ECSG) (EC, 2020) is "the standard for internal documents, drafts and communication (both external and internal) in the Commission" (EC, 2020, p.6) and focuses on clear writing and correct formatting. Published in 2019, ECSG was updated last in July 2020 and is valid as a document for internal use. Between both editions its name changed from *Commission Style Guide* (EC, 2019) to *European Commission Style Guide* (EC, 2020).

The gender-neutral section, Section F, on pages 44 and 45, contains verbatim the corresponding sections of ISG and ESG in the year of publication (2019). Also, references to titles are included in the section of upper and lower case (Section D). Other additions to the inclusive language section have not been integrated (like references to non-binarism or the avoidance of double singular pronoun pairs, which this guide still encourages) (ECSG, 2020).

Its main difference with ESG is the type of texts subject to its guidelines. While ESG is intended for all types of texts even of a legal nature, ECSG is limited to internal communications of the Commission's Secretariat-General. Also, this guide is not addressed at translators but to writers in the main drafting language of this institution: English. For that reason, it is not included in the public list of translation and drafting resources. One similarity between ESG and ECSG is that they are only available in English.

### 3.4 European Commission Guidelines for Inclusive Communication (2021)

In 2021, the European Commission launched its own inclusive communication guidelines (ECGIC) (EC, 2021), following in the steps of the European Parliament (EP, 2008) and the Council (GSC, 2018). The Parliament's and the Council's guidelines were translated to all EU official languages and their launch was much less controversial than the Commission's. In fact, the criticism in social media towards ECGIC from Europe's conservative and religious groups was so fierce that the Commission decided to withdraw the guidelines within months of their publication.

ECGIC's suggestions and recommendations "build on the existing *Commission Style Guide*" (EC, 2021, p.5), itself based on ISG and this on ESG as we have seen. Some of its guidelines "must always be followed" (EC, 2021, p.6). Those of gender-neutral language content can be summarized as follows (EC, 2021, p.6):

- do not use "gendered nouns", especially the particle *man* and masculine pronouns by default;
- aim for gender balance in panel discussions;
- use *Ms* instead of *Mrs* and *Miss* ("unless it is the explicit preference of the person addressed");
- offer four options of gender: man, woman, other and "prefers not to say";
- use "dear colleagues" instead of "ladies and gentlemen"; and
- avoid reinforcing "harmful stereotypes".

Other directions, added in a table (EC, 2021, p.10), instruct to:

- "avoid considering people as masculine by default";
- "avoid the use of gendered words";
- "don't reinforce harmful gender stereotypes"; and
- "don't patronise victimise, minimise or ignore women's contributions and the specific impact on women".

With regard to gender-neutral language, ESG and ECGIC show several differences. Besides adding an explanation of *gender-sensitive language* and swapping *men* and *women* for *one gender* and *another gender*, ECGIC recommends avoiding gendered pronouns for people whose gender is “unknown” (EC, 2021, p.9) instead of “not specified”, (DGT, 2021b, p.65). More importantly, ECGIC encourages the use of *he or she* and *his or her* on several occasions and in general “making both masculine and feminine visible” (EC, 2021, p.10), while linking neutral alternatives with masculine texts for their potential effects in translation.

Gender-neutral texts often lead to gender-insensitive translations that use generic masculine forms only, particularly in languages in which a neutral form is not possible. (EC, 2021, p.10)

Also different is the suppression of the *man-made* exception, which according to this guide can be replaced with *synthetic*. One addition contains a spelling error: *be little* instead of *belittle* (EC, 2021, p.9).

Table 6. Suggested correction of a spelling error in ECGIC (EC, 2021)

Error	Correction
<i>We should avoid expressions that may <u>be little</u> one of the genders or reinforce harmful stereotypes. (9)</i>	<i>We should avoid expressions that might <u>belittle</u> one of the genders or reinforce harmful stereotypes.</i>

A new paragraph is very explicit about the convenience of not using *Miss* and *Mrs*, “which unnecessarily reveal a woman’s marital status” (EC, 2021, p.9), although it then leaves it to the choice of the incumbent. It also stresses the importance of word order but fails to acknowledge that masculine is always placed first, not accidentally.

There is reference to not portraying women “in domestic or passive roles while men are active and adventurous” (EC, 2021, p.9). Also, emphasis is placed on organizing and participating in gender-balanced panels. The last paragraph of this section instructs the respecting of whichever pronoun non-binary persons identify with and using *Mx* as default.

ECGIC does not combine genders as the other guides, which for instance call for the avoidance of feminine gender profession nouns, such as *policewoman*, which is actually absent in the DGT corpus. On the contrary, traditional female roles can be sexist, like *housewife*, and ECGIC includes this noun in the examples (EC, 2021, p.10). Another difference is ECGIC’s focus on translation and in particular its comments on the effects of gender choices, for example specifying both genders “to ensure that the translation will be gender-sensitive” (EC, 2021, p.10).

As mentioned earlier, ECGIC was heavily criticized, mainly in the area of religion, with European media warning that the European Commission wanted to cancel Christmas for suggesting the replacement of *Christmas season* for *holiday season* (Giubilei, 2021). The Pope himself likened the guide to a dictatorship (Roberts, 2021) and as soon as it was withdrawn, the Catholic Commission of the Bishops’ Conferences of the EU issued a statement in support of the decision (Di Maio, 2021).

Despite the controversy, neither the instructions on the use of Christian names nor the replacement of words with *man* were new. For example, substituting *Christian name* with *first name*, *forename*, or *given name* was already suggested in the 2019 version of the ESG’s 8<sup>th</sup> edition and is still included in the current version (DGT, 2022a, p.70) but without the examples of Mary and John (the inclusive names suggested in ECGIC were Malika and Julio) (EC 2021, p.19). The same text had been printed three years before in the Council’s *Inclusive communication in the GSC* (GSC, 2018, p.11) but went unnoticed.

Suggestions to remove profession nouns that contain the *man* particle are even older and can be found in ESG since 1998. Other new directions run parallel, like the use of the non-binary title *Mx*, introduced in October 2021 in ECSG.

Leaving aspects unrelated to sexism aside, ECGIC’s emphasis on naming women (in pronouns and titles) is more in line with the feminist agenda than the stress on neutralization in the other guides, even though it fails to recognize outrightly that sexist language is caused by the indiscriminate use of masculine gender.

#### 4. Analysis of the results

A comparison of these four guides can begin with their own self-descriptions, especially in terms of their scope, target audience and enforceability. Unless otherwise noted, all comments refer to the latest edition of each. The guides are listed in chronological order of appearance of the first gender-neutral language section.

Table 7. Self-description of the style guides

<b>ESG</b>	<b>ISG</b>	<b>ECSG</b>	<b>ECGIC</b>
<i>A handbook for authors and translators in the European Commission</i> (DGT, 2022a, p.1)	<i>The uniform conventions retained in the guide prevail over any other solution proposed elsewhere or used previously; they must be applied at all stages of the written work</i> (EU, 2022, p.7)	<i>[...] the standard for internal documents, drafts and communication (both external and internal) in the Commission</i> (EC, 2020, p.6)	<i>[...] common standards for inclusive communication and to provide practical examples and advice to all colleagues</i> (EC, 2021, p.5)

Looking at the self-descriptor used, the guidelines range from being “the uniform conventions” (EU, 2022, p.7) to “the standard” (EC, 2020, p.6), “common standards” (EC, 2021, p.5) and “a handbook” (DGT, 2022a, p.1), in descending hierarchical order. The use of the definite or indefinite article in the description (or its absence in plural) also determines their intentional enforceability, notwithstanding the type of texts they apply to, from “all stages of the written work” (EU, 2022, p.7) to only “internal documents, drafts and communication” (EC, 2021, p.6).

As mentioned before, the four guides include adaptations of the text first published in ESG with different updates, additions and omissions. We will now try to merge their guidelines into one common set. Taken together, the four style guides propose the following gender-neutral guidelines in each of the main areas that affect the English language: subject and possessive third-person singular pronouns, the *man* particle, gendered person nouns and titles. Only the actual examples are discussed and subject to subsequent searches in the corpus. Non-gender guidelines present in the style guides are not included in this analysis.

ESG includes an introduction in the gender-neutral language section that warns of the sensitive nature of the subject. It has modified the definition of gender-neutral drafting which, according to ECSG and ISG, consists of avoiding masculine nouns for women and gender-specific pronouns (assumedly meaning masculine) for men and women alike. In the area of pronouns, ECGIC has 4 guidelines out of 6, ISG 5 of 15, ESG 6 of 13, and ECSG 7 of 11. ISG stresses avoiding gender pairs while ECGIC encourages their use.

ESG has added a paragraph about non-binary pronouns and calls for the use of “the appropriate pronoun” (DGT, 2022a, p.68) instead of “a gender-specific pronoun” (EC, 2020, p.44; EU, 2022, p.156). ESG also adds that singular *they* “has been attested to in print since the 14<sup>th</sup> century” (DGT, 2022a, p.69).

Table 8. Guidelines on subject and possessive 3<sup>rd</sup> person singular pronouns

Technique	Example	ESG	ISG	ECSG	ECGIC
Avoid gender pairs	<i>he/she</i> > ()		✓		
	<i>s(he)</i> > ()		✓		
	<i>s/he</i> > ()		✓		
Omit gender pronouns	<i>his/her</i> > ∅		✓	✓	
	<i>his/her/its</i> > ∅	✓	✓	✓	✓
	<i>his/her/their</i> > ∅	✓			
Redraft to 2nd person	<i>his/her</i> > <i>your</i>			✓	
Redraft to imperative	<i>his/her</i> > <i>your</i>	✓	✓	✓	
Redraft to plural	<i>(he)</i> > <i>they</i>	✓	✓	✓	
	<i>(his)</i> > <i>their</i>	✓	✓	✓	
	<i>his</i> > <i>their</i>				✓
Replace for a definite article	<i>his</i> > <i>the</i>	✓	✓	✓	
Replace for a gender pair	() > <i>he or she</i>		✓		✓
	() > <i>s/he</i>				✓
	<i>he</i> > <i>he or she</i>			✓	
	<i>he</i> > <i>his or her</i>				
Replace for singular <i>they</i>	() > <i>they</i>				✓
	<i>a passenger... they</i>	✓	✓	✓	
	<i>the person</i>	✓	✓		
	<i>responsible... their</i>				
Replace for the referent noun	<i>(he)</i> > <i>that passenger</i>	✓	✓	✓	
Use gender-specific pronouns	() > <i>he</i>	✓	✓		
	() > <i>her</i> <i>his</i> > <i>her</i>	✓	✓	✓	✓
Use the appropriate pronoun	() > <i>he/him, she/her, they/them</i>	✓			
	() > <i>their</i>	✓			

Directions dealing with the *man* particle focus on its avoidance or replacement for a neutral noun (not a feminine one, even in the case of *ombudsman*, despite the EU office being currently held by a woman) and showcase examples of nouns that are not necessarily common in the DGT corpus, as has been already discussed in the individual analyses.

Table 9. Directions regarding the *man* particle

Technique	Example	ESG	ISG	ECSG	ECGIC
Avoid	<i>chairman</i> > ∅	✓	✓	✓	✓
	<i>man-made</i> > ∅	✓			
Replace for a neutral noun	<i>(chairman)</i> > <i>chair</i>	✓	✓	✓	
	<i>(spokesman)</i> > <i>spokesperson</i>	✓	✓	✓	
	<i>businessman</i> > <i>businessperson</i>				✓
	<i>craftsman</i> > <i>craftsperson</i>	✓	✓	✓	
	<i>fireman</i> > <i>firefighter</i>				✓
	<i>firemen</i> > <i>firefighters</i>	✓	✓	✓	
	<i>fisherman</i> > <i>fisher</i>				✓
	<i>in layman's terms</i> > <i>simply put, in simple</i>	✓			

Technique	Example	ESG	ISG	ECSG	ECGIC
	<i>terms or in everyday language</i>				
	<i>man &gt; humanity</i>				✓
	<i>man hours &gt; labour hours</i>	✓			
	<i>mankind &gt; humanity</i>	✓			
	<i>mankind &gt; humankind</i>				✓
	<i>man-made &gt; artificial</i>	✓			
	<i>man-made &gt; artificial, human-made, manufactured</i>	✓			
	<i>man-made &gt; human induced</i>				✓
	<i>man-made &gt; human-made</i>	✓			
	<i>man-made &gt; manufactured</i>	✓			
	<i>man-made &gt; synthetic</i>				✓
	<i>manpower &gt; human resources</i>	✓			✓
	<i>manpower &gt; staff</i>	✓			
	<i>ombudsman &gt; ombudsperson</i>				✓
	<i>policeman &gt; police officer</i>				✓
	<i>policeman, policewoman &gt; police officer</i>	✓	✓	✓	
	<i>spaceman &gt; astronaut</i>				✓
	<i>spokesman &gt; spokesperson</i>				✓
	<i>the man in the street &gt; the average person</i>	✓			
	<i>tradesman &gt; tradesperson</i>	✓	✓	✓	
Replace for a neutral verb	<i>to man &gt; to staff</i>	✓			
	<i>manned &gt; crewed</i>				✓

Only ECGIC includes directions on gendered nouns based on a discursive approach, discouraging the reinforcement of gender stereotypes.

Table 10. Guidelines on gendered nouns

Technique	Example	ESG	ISG	ECSG	ECGIC
Don't reinforce harmful gender stereotypes	<i>wives &gt; partners</i>				✓
Replace for a neutral noun	<i>housewife &gt; housemaker/ houseperson</i>				✓

As far as titles and forms of treatment are concerned, the style guides recommend using *Ms* for women and only ECGIC mentions it as an alternative to *Miss* or *Mrs*. The new non-binary form of treatment, *Mx*, can be found in ESG and ECGIC, although its application in the corpus is null.

Table 11. Guidelines on forms of address

Technique	Example	ESG	ISG	ECSG	ECGIC
Avoid <i>Miss</i>	<i>Miss</i> > <i>Ms</i>				✓
Avoid <i>Mrs</i>	<i>Mrs</i> > <i>Ms</i>				✓
Use <i>Mx</i> for non-binary persons	() > <i>Mx</i>	✓			✓
Use <i>Ms</i>	() > <i>Ms</i>	✓		✓	✓

In the examples of titles, ECSG updated the positions of “Baroness Ashton” (EU, 2022, p.156; DGT, 2022a, p.68) to “Ms Mogherini” (EC, 2020, p.44) and from “Mr Delors” (EU, 2022, p.156; DGT, 2022a, p.68) to “Mr Juncker” (EC, 2020, p.44). ESG and ISG, although newer, have not updated the holders of the office of High Representative of the Union for Foreign Affairs and Security Policy (currently held by Josep Borrell) and the President of the European Commission (now Ursula von der Leyen).

The English style guides are rarely applied in translation into English since most EC documents are written in that language (Moorkens, et al., 2018), and do not include directions for translation into other official languages. Their capacity of transference between languages is not clear-cut due to the specific expressions of gender. This is the case with individual examples and certain guidelines, but not necessarily with the main features of non-sexist language, which can be universally applicable, like the avoidance of masculine gender when referring to women or the surveillance of equal treatment in language.

## 5. Conclusions

The corpus study shows that the guidelines are inconsistent and irrelevant, with terms and examples not appearing in real texts, imprecise instructions, context and exceptions, an incoherent and non-standard approach that is also unenforceable, lack of definition and unmonitored implementation.

A chronological analysis across 25 years of gender-sensitive English language guidelines in the EU originating in a common DGT text has shown substantial disparities in terms of content, scope and enforceability. However, there has been a noticeable change in priorities from gender specification to neutralization. All the style guides coincide in the irrelevance of their techniques and examples as measured in frequency in the corpus of study. Meaningful inconsistencies in gender-neutral guidelines are perceived among EU languages and institutions, although this study focuses only on English and the DGT. Also, the potential impact of these style guides in translation is greatly overlooked even if their directions are meant to be applied in texts that will most likely be translated to the remaining official languages. In fact, the only guide that emphasized relevant feminization and acknowledged the counterproductive translation effects of neutralizing English source texts (EC, 2021) was shortly discontinued for political reasons.

Despite this, gender specification in English as a translated language is key in order to avoid the transfer from neutral to masculine in semantic gendered languages and to elude lifting neutral to the status of masculine as the new generic gender. As the main language of drafting in the EU, it is crucial to pay attention to the gender effects in the translation from English of certain word choices, notably in the context of literal rendering, (Sosoni, 2012) where, for example, a metonymy or a singular person noun will most likely be translated with the same part of speech and therefore the gender effects are maintained (López-Medel, 2021a). Also, the guidelines could be included in the automated processes, and in the pre-editing and post-editing stages, as well as be part of the training programme for internal and external staff of the DGT gender equality awareness plans (DGT, 2022b).

To counterbalance the above deficiencies, a set of standard and coherent guidelines like the United Nations’ (UN, 2021) is suggested. They encourage mentioning gender when relevant and not mentioning it when not relevant. Here, the visibility of women in language can be considered essential in the pursuit of equality as it counteracts two of the main problems of sexist language, of utmost importance in legal settings: imprecision and ambiguity. In this respect, non-sexist language adapts itself quite well to the tendencies observed in EU texts: explicitation, simplification, normalization and levelling out (cf. Baker in Seracini 2020, pp.53-54). Also, it would be desirable that the style guides contain an unequivocal indication of the importance of implementing non-sexist language in the EU as a gender mainstreaming tool.

To redress the guides' impracticality brought about by the irrelevance of their techniques and examples for EU linguists, the guidelines must be precise, contextualized and applicable. This can be ensured by checking their numbers in the corpus, and prioritizing the parts of speech and expressions that are most frequent in real EU texts and controversial in terms of gender. When drafting English texts, consideration must be made of the potential effects of gender choices in the context of literal translation, acknowledging that certain gender-neutral strategies in the source language (for example, converting singular to plural pronouns in English) might still be translated in the masculine. A revision of non-sexist language strategies used in the source text and their potential effects in translation with regard to the expression of gender could be conveniently added to the pre-editing stage of the translation process.

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