

Risk management in translation: A reply to critics

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Abstract: Risk management has been proposed as an approach that can help explain why translators make certain decisions in certain situations. A review of the surprisingly extensive work done to apply the concepts to translation suggests that one of the intellectual attractions of the approach is that it can avoid the essentialisms of equivalence and univocal purposes. Risk management has nevertheless been criticized on several fronts: for purporting to explain all aspects of a more complex process, for assuming a rational translator, for deviating from accuracy as the translator's main task, for overlooking the affective dimensions of language use, and for being associated with the evils of economics. These criticisms lose ground when risk management is seen as part of a wider approach to translation, and when the concepts are not taken as an account of everything that translators do.

Risk management is an approach to the way translators (here including interpreters) can make decisions under conditions of uncertainty. It can be summarized as a series of run-of-the-mill propositions: risk is the estimated probability of a communicative aim not being achieved; that estimated probability is particularly high in translation situations; translators can manage the uncertainty by reducing risk (simplification, generalization, omission), transferring risk (reference to authority), taking risk (experimenting or otherwise attracting attention), or adopting trade-offs combining those strategies; to do any of those things, however, they require the trust of the other communication participants, so the greatest hazard they face is actually the potential loss of their credibility. In my own work on risk management, I add two further considerations that are more open to contention: first, the overall communicative aim is, for me, win-win relations between all the participants, and second, since texts are uneven in their importance for risk, translators should invest greater efforts in the high-stakes parts. Together, all these propositions make risk management a non-essentialist approach that I believe is able to replace equivalence as a general guide for translation. The approach is also compatible with current interests in the ethics and identities of mediators (questions about who manages what), the affective dimensions of language (risks are felt and responded to emotionally), and complexity theory (which provides the background condition for generalized uncertainty).

Beyond formal translation theory, risk management has attained front-page status in discussions of neural machine translation and generative AI. This is partly because public policies seek to identify and manage the many different risks posed by language automation (the 2024 EU Artificial Intelligence Act is pure risk management). It is also because the technologies push translators towards more active decision-making roles in cross-cultural communication, beyond the sentence-replacement processes that are now more or less automated. That is, there are new risks posed by the technology itself, and new risk-

management roles to be taken on by human translators in response to the technology. Hence, I suspect, some of the current interest in risk management as an approach to translation.

Perhaps because of these circumstances, the above propositions have been subject to critiques, notably by Daniel Gile (2021), Sandra Halverson and Haidee Kotze (2022), and much more indirectly by Douglas Robinson (2023). My purpose here is to respond to those critiques, to accept the points well made, and to clarify a few possible doubts or misunderstandings.

Previous forays into risk management

Risk management has been explored as a formal approach to translation and interpreting at least since Wilss (2005). At about the same time, I included it alongside complexity, cooperation, trust, and intercultural communication in a set of basic propositions on translation and cross-cultural communication (Pym, 2004). I have since explored the concept in a series of papers leading up to two synthetic statements (Pym, 2015, 2021) and a very short book (Pym, 2025). In parallel, an application to translation workflows was presented in Ardelean (2015), with an extension to the risks of automated translation in the second edition (2023). The general approach has also been explored empirically, often alongside compatible conceptual frameworks, to translators' uncertainty management (Künzli, 2004; Angelone, 2010), interpreters' omissions (Pym, 2008; Zhong, 2020), translator training (Hui, 2012), high-stakes political translations (Ayyad & Pym, 2012; Pym & B. Hu, 2019), news interpreting (Matsushita, 2016), swear words (Hjort, 2017), post-editing (Nitzke et al., 2019), damages in safety-critical situations (Canfora & Ottmann, 2018, 2019), translation norms (B. Hu, 2020; Hao, 2024), explicitation and implicitation (Pym, 2005; Shih & Cai, 2008; Kruger & De Sutter, 2018; Jiménez-Crespo & Sánchez, 2021), linguistic interference in interpreters' renditions (Xu, 2021), sight translation (He & Wang, 2021), translators' documentation practices (Cui & Zheng, 2022), translators' anger (Naranjo, 2022), diplomatic interpreting (Zhou, 2022; 志凯高, 成詹, & 旭李, 2024), translation reception (B. Hu, 2022; K. Hu, 2024; Pym & Hu, 2024; Qiu & Pym, 2024), the triage of languages for emergency translations (Pym, 2023), court interpreting (Pym, Raigal-Aran, & Bestué Salinas, 2023), media interpreting (Li & Zhan, 2024), legal translation (Duběda, 2024), online collaborative literary translation (Pan & Xiao, 2024), healthcare communication (Grenall & Schmidt-Melbye, 2024), interpreters' repairs (Vranjes & Defrancq, 2024), corporate annual reports (Wang & Liu, 2024), and probably further studies that I have not seen. As noted, risk assessment has also become an important part of working with machine translation and generative AI (e.g., Nurminen, 2019; Canfora & Ottmann, 2020; Bowker, 2021, 2023; Ardelean, 2023; Qiu & Pym, 2024; Koponen & Nurminen, 2024).

As can be gleaned from the above dates, the risk-management approach enjoyed a minority or even underground existence for some 15 years prior to Gile (2021) and Halverson and Kotze (2022). The critiques might be because the approach has started to take on some importance. At last, someone has noticed! For that, I am very grateful. But I am less than enamored by what the critics have to say.

Gile's critique

Daniel Gile is a professional conference interpreter, trainer, and researcher who has long been a leading authority on the techniques of conference interpreting. He is well known for his 'effort models,' in which the conference interpreter is seen as distributing efforts between several competing tasks: listening and analysis, memory, production, and coordination. In his classic text *Basic Concepts and Models for Interpreter and Translator Training* (1995,

revised in 2000), risk is mentioned some 30 times, almost always in association with potential *loss* resulting from inadequate effort distribution: “risk of making guesses” (70), “risk of writing an inadequate translation” (82), “Risk and Loss Values” (109), “Risk of Error” (109), “risk of losing the next Translation Units” (111, cf. 201, 204, 212), “risk of getting stuck” (164), “risk of saturation” (179, 198, 210, 239), “risk of [linguistic] interference” (181, 187, 236, 237, 240, 243), “risk of misunderstanding” (204), and “risk of short-term memory overload” (206). That is, risk is associated with bad things happening. There are, however, three instances in which risk-taking is envisaged in more positive terms: “Some Errors are associated with such a small Loss that even a high probability of error is acceptable” (109), interpreters must be “willing to take more risks” than written translators because of the greater time constraints and range of subject matter (112), and interpreters are therefore involved in “taking decisions and accepting the associated risks” (115). While I do not share the majority view that risk is mostly of bad things and therefore needs always to be reduced or avoided, I very much agree with Gile’s much less frequent recognition that risk-taking can sometimes be a good thing because losses are highly variable. Not by chance, I cited Gile in my 2004 and 2015 papers, and in a wide elsewhere. I am very interested in how efforts are distributed, after all.

Points accepted

In his critique of my work on risk management (basically addressing Pym, 2015), Gile (2021) makes some very pertinent and timely contributions that I am pleased to accept:

- When describing the parts of a text that have different potential consequences, he proposes that the range should go from ‘low-stakes’ to ‘high-stakes’ rather than ‘low-risk’ to ‘high-risk,’ given that the latter terms are only meaningful in a particular reception situation and frequency timeframe. That rectification is very useful. I have adopted it, with gratitude.
- Similarly, when Matsushita and I talked about the balancing of risks as “risk mitigation” (Pym & Matsushita, 2018), Gile points to an alternative usage where the term ‘mitigation’ refers to *all* kinds of risk aversion. I have now consequently taken to calling the risk-balancing acts ‘trade-offs’ rather than ‘mitigation,’ once again with thanks for the critical observation. Anything that can help us move toward shared terms is much appreciated.
- Gile points out that “risk is more often a constraint than a driver of decision” and that one should also look at “achievement-oriented decision making” (2021, pp. 56, cf. 59, 60). The observation is very correct, and I am happy to recognize it. When I talk about “Translation as Risk Management” (the title of Pym, 2015), that should not imply that translation *is only* risk management. There are other drivers, of course.

The aim is not to account for everything.

Those should all be fairly minor points. Let me insist a little more, though, on that last-mentioned aspect, which is perhaps not just an innocent misunderstanding. I would not claim (and I hope I have never claimed) that risk management ‘drives’ all decisions, neither in translation nor anywhere else. When an investment banker analyzes risks, their up-front aim is basically to maximize return on investment, not to balance risks for risks’ sake. Similarly, when a translator is faced with deciding between alternative renditions, the overriding aim (I propose) is to achieve cooperation between all communication participants while maintaining trust relations, and risks are therefore no more than a set of constraints that have to be dealt with along the way. That is why, when I defend my general view of translator ethics (Pym,

2021), there are *three* main concepts in play: cooperation, trust, and risk. And the risk part does indeed formalize the *constraints* pertaining to cooperation and trust. That is not a new flash of enlightenment on my part. In my programmatic “Propositions on Cross-cultural Communication and Translation” (Pym 2004), there were 20 sets of propositions, with only one set on risk management (others concerned cooperation as a success condition, trust as being necessary for that aim, and complexity as the background condition for the uncertainty with which decisions are made). If anyone wants to check it: there are 161 propositions in that text (I worked hard on it!), only 19 of which include the term ‘risk.’ So where did Gile get the idea that risk management could ever be a “driver” or a replacement for “achievement-oriented decision making”? Did I really write so badly? In the text “Translating as Risk Management” (2015), risk management is specifically qualified four times as “a view of translation” – one approach among many. And its purpose is explicitly described there as being a way to solve a very basic theoretical problem: how to define the specificity of translation without recourse to an essentialist concept of equivalence. Nowhere in that text do I presume to tell anyone *how* to translate. Nowhere do I say that risk management is all there is.

One cannot assume certainty.

Gile (2021) sort of accepts what I have to say about credibility risk and communicative (situational) risk. But he has a problem with uncertainty risk: “How does one determine whether source-text items are handled adequately?”, he asks. That is indeed a major bone of contention. For me, that question can be answered by the degree to which the rendition achieves the success conditions, which in turn depend on an ethics of cooperation. For Gile, the question is answered quite differently: “‘comprehension risk’ often leads to errors, omissions, and/or infelicities (EOIs)” (p. 59). Note the shift: what I call “uncertainty” has become “comprehension,” which in turn is calqued on the *assumed certainty* that the text can be fully comprehended, since it is only on that basis that one can presume to identify errors or omissions, which are Gile’s stock in trade. Gile then unproblematically talks about the “risk of making errors and omissions” (as is the majority view in his *Basic Concepts and Models*), which is then glossed as something called “cognitive risk” (p. 60), as if he and I shared the same epistemology.

This where we see Gile’s positivist and essentialist view of communication coming out. For him, and for many others working in the equivalence paradigm, there is mostly just one meaning in the text, and every rendition can be measured against it, with associated degrees of “loss of information” (alongside similar terms gleaned above from Gile’s *Basic Concepts and Models*). This is not presented as a major point in Gile’s argument; it is more like a passing assumption to which we are all expected to agree. For me, on the other hand, the indeterminacy of translation is more general than any such certainty (the illusion of which ensues from the power of authorities). In fact, my whole aim was and remains to construct a theory of translation without making precisely that essentialist assumption. For me, every text is open to interpretation; meaning is plural; every rendition will thus entail a degree of uncertainty; and yet we translate successfully. How is that possible? By managing risks, I propose. Since Gile fundamentally does not see the theoretical challenge of avoiding essentialism, he relegates risk taking to a minority position and thereby genuinely struggles to grasp what I was trying to do.

That difference in epistemologies might explain trivial but annoying comments such as: “Pym (2015) did not take a position regarding the minimax principle” (Gile 2021, p. 61). Wrong: Pym (2015, p. 74) explicitly mentions the minimax principle that the aim is to invest a minimum of effort for a maximum of again, but he explicitly does *not* accept its assumption

of the foundational principle of closed game theory: that all information is available. That is part of the indeterminist position that Gile clearly does not get.

Risk-taking can be good.

For Gile (2021, p. 57), risk refers overwhelmingly to possible negative outcomes, without giving any clear reason for that preference. As noted, he allows some risk-taking, but only when the stakes are minimal. On the other hand, I have always argued that translators should see risk in positive terms as well, so that they can decide to take risks in cases where there are likely to be positive gains that warrant it. This is because there is some empirical evidence suggesting that translators tend to be risk averse (Pym, 2015, pp. 76-77), which leads to boring texts (to risk a brutal simplification of research on translation ‘tendencies’ or ‘universals’). I would like translators to produce more exciting texts, to create a sense of event in the encounter with the other, to open cultures to interaction with the foreign. In deciding to play it safe, Gile misses that critical potential. Boring is good, apparently. Risk management, for Gile, is basically risk aversion, with allowance for the minority view that risk taking can be justified only when very little depends on it.

Translation involves decisions regarding risk.

Why does Gile think that translators’ decision-making should not involve *high*-stakes risk taking? A reason can be inferred when he lays out the prime aim of all translators from all cultures and all history, apparently as agreed by the authorities of codes of ethics, clients, and trainers: “Translators aim first and foremost to achieve compliance with applicable norms and with the preferences of stakeholders” (2021, p. 59). That is, there should be no overlap between the risks that translators deal with (small technical things) and what other stakeholders decide (major strategic things). There you have it: the ethically and politically ‘complying’ (sometimes complicit) translator. That, I suspect, is what Gile fears is being undermined by all this talk about risk; it is perhaps what he most seeks to defend.

There are some engaging long-term debates on this issue, particularly concerning the extent to which interpreters should engage in situation management (which I see as active risk management). In conference interpreting, any discursive intervention by the interpreter can potentially induce conflicting discursive voices for the audience (Collados & Gile, 2002) and interpreters might therefore prefer not to take such clear risks. In many forms of community interpreting, however, there are numerous situations where interpreters can and should take such risks by intervening (Abraham & Fiola, 2021), particularly in the defense of vulnerable parties (Tipton, 2023). One has to consider more than conference interpreters.

There is, however, a more basic misunderstanding here. Gile is talking about risk management by the *lone* translator or interpreter, whereas these days I apply the concept to ‘translation’ in a much less individuated sense. The translation process can and often does involve many different people and professions, including clients, agents, publishers, editors, and clients. Risk is managed by any and all of those people, not just the lone translator. The stakes can also concern many different time frames, from cooperation in immediate face-to-face encounters right through to the translation policies that can have long-term effects on the make-up of multicultural societies and the fate of languages. I would hope this is clear from the range of case studies we have dealt with – even though Gile (2021, p. 57) strangely says I present top-down ideas. When discussing the shifting Chinese translations of the United States’ ‘One China’ position (Pym & Hu, 2019), it would make no sense to talk about an individual translator taking risks: the risks are managed by political leaders and an entire foreign-affairs apparatus. Or when analyzing a military encounter in Afghanistan (Pym, 2016), I look at the risks being taken by each party in the complex of exchanges, since

translation involves more than the one translator. Or again, the slow historical processes by which trust relationships are built up across languages can then make certain translation practices possible over equally expansive time frames. When I apply negotiation theory to Hispanic translation history (Pym, 2000), risks are taken and avoided on the level of centuries.

I have no doubt that Gile means well in defending the current Western understanding of the ideal professional role of the ideal individual translator. But translation *as* risk management can and should concern much more than that.

Halverson and Kotze's critique

Gile's critique might be seen as an attempt to shore up positions he had formulated many years earlier. Sandra Halverson and Haidee Kotze, on the other hand, seek to shipwreck both my risk management approach and Gideon Toury's norm theory in order to salvage what they see as the positive points that can then be incorporated into their own approach to translation, which they present at the end of their spiel. Here I will not attempt to defend Toury's norm theory (my own critique is in Pym, 1998, pp. 110-115) and I will not attempt to evaluate Halverson and Kotze's own alternative, which I suspect I do not understand very well. I will focus on what they have to say about risk management.

Translators do not always optimize.

Halverson and Kotze seem most upset by my rather simple proposal that the higher the stakes in a translator decision, the greater the effort that should be invested in making that decision. In other words, only work hard when it counts. For most people, that would be common sense. For Halverson and Kotze, it is unacceptable rationalism, glossed as "optimization" and dispensed with through a reference to interdisciplinary consensus: "in many quarters there is broad agreement that much human choice-making is based on processes other than rational assessment of cost-benefit (for survey, see Kahneman, 2011)" (2022, p. 63). For the record, Gile is not enamored of implicit rationalism either (p. 61).

Now, wait a minute. My model where efforts correlate with risks is specifically presented as something I teach: "simple lessons that can be taught in most introductory classes" (Pym, 2015, p. 73). The model also says what students should get better at: they should progressively expend more effort on high-stakes problems (less guessing) and less effort on low-stakes problems (greater efficiency). There is now just a little empirical evidence for that view: He and Wang (2021, p. 195) find that "in high-risk situations the professionals behave more economically than novices". But the model has never been presented as something that *all* human decision-makers are supposed to do. In fact, the non-universality of the principle is presumably why I have the honor and privilege to teach some people: I can hopefully suggest how they can make *better* decisions. It is also, by the way, why Kahneman (2011) – the "survey" that Halverson and Kotze recruit to their cause – describes all the intuitive heuristics that people use and compares them with the calculations that they probably *should* use. Kahneman wants to teach us how to make better decisions, and costs and benefits are very much among the conceptual tools he uses (too mathematically for my liking, but still). I am interested in how people can make better decisions concerning translation.

Debates about rationalism should have little to say here. Let me nevertheless point to the numerous versions of 'bounded rationality' (from Rubinstein, 1998) that are now available to anyone prepared to go beyond the absurd binarism of rationalism yes or no (see the survey by Wheeler, 2024). The more productive question is whether risk management must be forever bound to an economic kind of rationalism (which is certainly where it comes

from) or can be used in a more exploratory way. For the record, this is what Pym says about relations between stakes and effort: “Various kinds of evidence can be mustered in support of the model, although none of it would seem definitive” (2015, p. 75). More important, any rationalist precept attributed to me concerning efforts and stakes is explicitly countered by what I call the ‘ruse of trust,’ where an otherwise insignificant part of a text can merit the expenditure of effort because a mistake *anywhere* can be used to challenge the translator’s credibility.

Are we in or out of linguistics?

Halverson and Kotze seem inordinately worried about something called ‘ontological stability,’ which appears to concern not only their misunderstanding of the way I use optimization but also travels hand-in-hand with concerns about the status of linguistics in translation theory. Why this should be so harks back to a position previously announced by Halverson (2020, p. 46) in quite startling terms: “If the underlying view of language [in risk-management theory] is dubious or unclear, theories and hypotheses cannot be compared, new theories cannot be developed and existing ones cannot be justified.” This seems to be saying that only linguists can sit at the cool kids’ table – if you are not there, you are not in the game. Given the steadily diminishing role played by any kind of linguistics in translation studies over the past twenty years, this very courageous position statement comes close to unwitting self-parody.

Much as I would like to present some tight, conceptual argument on this point, my perplexity is such that I can only venture a rough scorecard of what seems to be in or out of linguistics:

- Halverson and Kotze (p. 64) state that “the entire apparatus of risk management rests on a model of communication whose core seems to be the Gricean notion of ‘cooperation’ (Pym, 2015, p. 72) and whose realization in translation is linguistic in nature.” Apparently, Pym would be trying to do linguistics, since Grice is recruited into that team. In fact, I confess, my model of cooperation is based on neo-classical economics (the idea of mutual benefits), which is not in Grice and rarely in linguistics.
- That said, I recognize Grice as a foundational thinker in pragmatics, which I would include in linguistics and to I would like to contribute. For that reason, my 2015 text was published in a place called... *Journal of Pragmatics*.
- Halverson and Kotze (p. 64) then take issue with my claim that mainstream sentence-level linguistics cannot see why three noun phrases, in a particular context, could involve three very different kinds of stakes. Is the claim correct? Of course, because sentence-level linguistics does not account for context (pragmatics does). What the critics object to is not the claim as such but my apparent characterization of a whole discipline: “linguistic approaches to the study of translation were definitely not using ‘sentence-level linguistics’ in the early years of this millennium” (p. 64). But I never said they were! I merely pointed out the limitations of a certain kind of linguistics. (For the record, sentence-level comparative linguistics is alive and well in some parts of the world – a lot of it is happening in the room right next to where I am writing from, in Spain.)

What most worries me here is that ontological consistency seems to be politically allied with the authority of an established discipline. This can have negative consequences, as when one follows so closely the principles of the parent discipline that local specifics are ignored. A prime example, as it happens, would be when Halverson (1999) pronounces that

‘translation’ is a prototype concept because that fits in with what cognitive science finds about concepts in general. In so doing, she overlooks what a more careful phenomenology could have led her to: the discursive disruption that defines the Western translation form when analyzed from the perspective of reported speech. That is, she overlooked a small tradition within linguistics! (That has nothing to do with risk management, but I couldn’t help myself.)

Is risk management inside or outside of linguistics? The question is ultimately irrelevant. Explorations and insights are always welcome, wherever they come from. And ontological consistency of the linguistic kind is therefore not a virtue.

Can risk management be more than economic?

A further kind of critique focuses more squarely on the economic origins of risk-management models and the limitations of the corresponding worldview. If a scholar does not like economics for some reason, they are probably not going to like the concepts of risk management. The question is then whether the concepts can be dragged across from one discipline to another, from neo-classical economics to translation studies, without bringing in all the accumulated intellectual and political baggage of that discipline. Is it not possible to talk about risk without sounding like Milton Friedman? (Psychologists do, but then we could be condemned for bringing in all the baggage of psychology.)

There are actually two lines of criticism here. The most serious concerns the affective dimensions of language use, which may appear to be overlooked by the abstract categories of risk analysis. The second has more to do with activist positions, for which the mere whiff of money is enough to condemn any intellectual endeavor to the wrong side of history.

Risks are felt as feelings and emotions.

Douglas Robinson (2023, but in many other books as well) rigorously does not accept the rationality and egoism of *homo economicus*, dubbed ‘econ’, because that view denies the many ways in which meanings and expressions are *felt* to be appropriate or not, in accordance with a model in which cognition is not an affair of cerebral risk calculations but is instead a part of embodied processes, enacted in linguistic performances in the situations and social contexts in which it is embedded. From that perspective, Robinson sees risk management as a rejection of the affective dimensions of language, assuming that I have consequently always rejected his views on cognition “on the grounds that feelings don’t exist” (2023, p. 82). That is, the risk management approach would be missing out on the way people really use language, both individually and socially.

The reply here is fairly straightforward: feelings (and emotions, embodiment, enactment, extension, etc.) do indeed exist, and there is no necessary disjunction between them and what risk management has to say. Part of this may be appreciated through experience, which is where Robinson bases his appeals. As I translate a text, I do indeed instinctively *feel* that there are certain passages that are not quite right, that need a second look, or should be adjusted to suit the situation I am working in. One *senses* hazards; one *instinctively* takes measures to adjust to risks; one rarely does those things by writing up a table of prospective gains, losses, and probabilities, and then deciding in accordance with what the numbers say. Where do those instincts and feelings come from? Of course, from repeated experience of what happens in situation after situation, from seeing what goes on with others, from internalizing the knowledge conveyed through and in language, and beyond that, from some 300 thousand years of human evolution, giving us fine-tuned instincts concerning danger, opportunity, and how to navigate around them. All of that comes with embodied cognition, which might be why Keynes (1936, p. 161) recognized that not only the

sensing of hazards but also individual *risk-taking* draws on more than conscious calculations: “Most, probably, of our decisions to do something positive, the full consequences of which will be drawn out over many days to come, can only be taken as a result of animal spirits – of a spontaneous urge to action rather than inaction, and not as the outcome of a weighted average of quantitative benefits multiplied by quantitative probabilities.” The analysis of risks can help explain *a posteriori* the logics by which those things work, but there is no reason why it should assume its categories are constantly in the minds or hearts of everyone.

When a US army unit enters an Afghan village, all parties are genuinely frightened and operating on mixes of instinct and more or less internalized rules (the analysis is in Pym, 2016). When the interpreter entirely misrepresents when is said in Pashto, he is perhaps aware that he is breaking some kind of professional precept, but he is also operating on the basis of a deep survival instinct – tell the Americans what they want to hear, so they will trust you and get you out the hell of there. All those strategies and drives are intermingling in that very human scene. When we then do the abstract risk analysis (as I do in class), asking for each party what outcomes they are probably striving to avoid and what risks they are prepared to take, we can attribute a certain logic to what happens, particularly to the interpreter’s decision not to interpret with any semblance of accuracy. We can attribute a logic to his action. But does that logic somehow replace the complexity of what went through his mind? Not at all. It is more like an initial attempt to understand the other, to see the world from their perspective, rather than condemn out of hand an action that would otherwise be merely breaking many rules.

I am reminded of Bourdieu, in *Le sens pratique* (1980), reflecting at considerable length that a sociologist, in proposing an explanation of what people do, will never see actions and decisions in the way that the people do, as something that is natural, done without any need for analysis or explanation. When I pick up the conceptual tools of risk management, I accept that limitation. And that is all the ontology I need.

Does risk management only help the powerful?

An associated but more trivial misunderstanding appears in Boukhaffa (2025), where the proper role of translation ethics is seen as being to oppose anything from economics and commerce, which can only help power, business, capitalism, hegemonic English, and the rest. Risk management is therefore placed among the evils of the world, and Pym consequently “stands as a strong ally of the powerful” (2023, p. 150). (If only someone powerful knew about it!) Boukhaffa’s arguments have more to do with cooperation than risk as such, but his discursive strategy prevails throughout the screed: bad people talk about risk management, I talk about risk management, therefore I am a bad person.

The fallacy should be obvious. If it is not, gentle reader, please go back to the run-of-the-mill propositions at the beginning of the text you are reading now, then decide for yourself whether they are plotting against the greater good of translators. I see no cause for guilt by association. Further, I suggest that if a set of concepts can help avoid negative consequences, can enhance mutual benefits, and can thereby improve the lot of communication participants (even with very unequal power relations), then those concepts could and should be applied in ways that are individually and socially empowering. Indeed, the propositions of risk management stand a chance of being rather more empowering than any pathetically binary division of the world into good vs. bad.

Closing remark: On the political work of concepts

Most of the critiques addressed here wrongly assume that the aim of the risk-management approach is or should be or is intended to be to explain all aspects of all actions by all

translators. This is presumably why Gile notes, correctly but unnecessarily, that there are other drivers at work, why Halverson and Kotze nostalgically crave some kind of stable ontology from which the whole world will make coherent philosophical sense, and perhaps why Robinson insists he knows the real places where translation happens. Risk-management will always fall short when compared with those kinds of totalizing aspirations; it needs to be used alongside other sets of concepts. True, the framework can be applied to a very wide range of actors in the scene of translation and on numerous different levels, from narrow linguistic decisions right through to long-term influences on relations between cultures. That capacity to connect the cognitive with the social and political is, I believe, one of its potential strengths, and a reason why there is much more to discover. But that does not imply that risk management can or should explain everything.

Why might something like risk management nevertheless have a role to play in translation studies? Consider for a moment the ways in which concepts can influence the development of a discipline. Toury's declared aim in theorizing norms and laws was not to propose any ontology able to keep linguistic philosophers happy. It was overtly to steer translation studies away from a situation where it risked devolving into a set of isolated descriptions (see especially Toury 1991) – a risk that is still with us, by the way. Judged by that yardstick, the norm concept was tremendously successful: for a string of years, countless theses and dissertations set out to locate and compare translation norms (although the search for laws was admittedly harder to understand and much less influential). That might be some kind of model for the political virtues of a concept as an intellectual tool: it does its work, exerts a certain influence, and can then be put out to pasture or absorbed into newer concepts.

What would be the ideal role of risk management in translation studies? In my own thinking, the framework addresses the deep historical question of how to live with indeterminacy, understood as the absence of linear or reversible causation. In practical terms, risk management can help us decide between alternatives in situations where there is no wholly correct answer; it can help us live with uncertainty by estimating (and feeling!) probabilities. It can be used alongside the many alternatives currently available in translation studies that are, I suspect, less well equipped to address how such decisions could or should be made: complexity theory repeats its certitudes; activism fights the good fights by refusing to grapple with uncertainty; authoritarian pedagogues will always continue to preach their own assumed truths without asking why they seem to be true; materiality remind us of the obvious; while cognitive studies and the like delve ever deeper into the hyper-empirical accumulation of facts without important large-scale hypotheses to test. Risk management has no need to do away with any of those approaches.

A study on a small group of students carried out as a Master's thesis (De Blancq, 2023) swallows hook-line-and-sinker the critiques formulated by Gile and Halverson and Kotze – which was one reason for writing this reply. Empirically, the study is also of interest because it finds that exposure to the theory of risk management did *not* make students translate better, and I am fine with that (although a before-and-after research design might have reached a different conclusion). At the same time, the study found that all but one of the experiment-group students thought that risk management should be included in translation courses, and that one dissenter argued that risk management was already there implicitly. I could not ask for anything more.

Why explore risk management? Basically, because it can help us discuss with some intelligence the kinds of decisions that we all have to make every day, why a few decisions might be better than others, and why this way of thinking is of particular relevance for translation.

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