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Bridging legal cultures

The translation of legal culture-specific words in Crown Court criminal judgements

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ABSTRACT: The article focuses on the analysis of legal culture-specific words found in Crown Court criminal judgements as well as how the translation of such linguistic units may influence the outcome of a criminal trial. The main objective of the research is to demonstrate that the main linguistic problem posed by legal translations, particularly in criminal-related texts is the translation of legal culture-specific words, one of the few linguistic units in this field of which translations can fairly be considered subjective. In order to undergo the research, we have employed three main methods pertaining to qualitative research, amongst which an in-depth discourse analysis of a limited series of the most recent criminal judgements in English emitted by the Crown Court as far as the translation of legal culture-specific words is concerned and its indomitable impact on the decision-making process, but also content analysis and case study. The aim of this paper is to investigate whether automated translation is an adequate, acceptable and accurate choice in the legal translation of criminal law corpora, what are the main errors encountered and what advantages and the positive characteristics of this kind of translation in comparison with human translation. We shall also discuss the importance of acquiring comparative law knowledge in order to achieve an adequate and accurate translation and argue according to this view, the role of the translator in the 21st century beyond post-editing. In order to achieve this objective, we set out a corpus-based investigation that analyses various renditions and translations of criminal judgements that focus on legal culture-bound words.

KEYWORDS: legal translation; legal linguistics; criminal law judgements; legal culture-bound words; AI; machine legal translation.

SUMMARY: 1. Introduction; 2. Translation of legal culture: how to solve equivalence problems of legal culture-bound words; 3. The particularities of AI or machine translation of legal texts and legal culture-bound words; 4. Case study. A human and machine translation brief analysis of criminal law judgements from the Crown Court; 4.1. Case description and methodology; 4.2. Case analysis, discussion and findings; 5. Conclusions.

1. Introduction

In recent years, the most pressing matter in translation studies and in the translation activity in the existence and development of machine translation. Amongst the most important recent research papers that have touched upon the subject is the one written by Fernando Prieto Ramos¹, in which the role of AI and MT in the translation process is undeniable, yet there are certain domains such as the legal field where the translation competence, the intrapersonal management skills and the responsibility of a human translator is still necessary². In the same vein, in this study we may find several questions that aroused concerning this subject, regarding the extent to which a translator could be replaced by a MT program, the accuracy and adequacy of MT translations as well as the strategies and methods of translation employed by MT to produce effective and appropriate equivalents for problematic terms in specialized translations, such as legal culture-bound words. One of the authors who thoroughly defines the concept

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¹ F. PRIETO RAMOS, *Revisiting translator competence in the age of artificial intelligence: the case of legal and institutional translation*, in *The Interpreter and Translator Trainer* 18(1), pp. 148-173, 2024.

² Ibidem.



of culture-bound words or *culturemes* is Aixelá³ who outlines a thorough definition of the concept, namely “elements whose function and connotations in source text involve a translation problem because they do not exist or have a different status in the target language”⁴.

Other authors that have commented upon this widely researched concept in applied linguistics are Hurtado Albir⁵, who defines them as “*elementos culturales característicos de una cultura presentes en un texto y que, por su especificidad, pueden provocar problemas de traducción*”⁶ as well as Newmark⁷, Nord⁸ who introduces the specific concept of *cultureme* and who links it to its fundamental role in the process of communication⁹ and especially Katan¹⁰ whose definition and analysis of the culture-bound words is of the utmost importance the approach that we have undertaken, that is investigating legal *culturemes*, because Katan believes that culture-bound words are based on shared beliefs, values and theoretical frameworks¹¹.

The literature gap that we will be filling refer to the way in which machine translation tackled difficult translation problems in the translation process of a highly specialized text from the criminal law field. In order to conduct this study, we have divided our article into three parts: two theoretical chapters related with legal culture-bound words and the link between machine translation and legal translation as well as an illustrative case study filled with examples supporting our opinions. Previous studies, even recent ones, such as Bajčić and Golenko¹², who state that the main problems encountered in automated translation are terminological consistency and cultural adaptation, or in particular, Giampieri state that there are significantly few research papers discussing the use of MT in legal translation and how automated translation can be used by authorized translation or in legal firms¹³.

2. Translation of legal culture: how to solve equivalence problems of legal culture-bound words

Translation is generally a very specific and thorough process that involves not only possessing very well-refined linguistic and translation skills, but also a predisposition to delve deeper into the context which influences and determines the field in question and implicitly the source text to be translated, according to both authors of recent studies on the matter such as Xu, D.¹⁴, but also to traditionally recognized scholars in translation studies and applied linguistics such as Juliane House¹⁵ or Anthony Pym¹⁶. In this case, when analysing legal texts, we must take into consideration both the specialized nature of the language involved as well as the particular grammatical, lexical and stylistic characteristics of the legal field. This criterion that we will be using in our case study is also supported by researchers such as Maurizio Gotti, who underlines the importance of analysing the linguistic characteristics of legal texts in the translation process due to cultural difficulties¹⁷ and by a renowned

³ J.F., AIXELÁ, *Culture-Specific Items in Translation*, in Álvarez & Vidal (eds.), *Translation, Power, Subversion*, Clevedon, 1996.

⁴ J.F., AIXELÁ, *op. cit.*, p. 58.

⁵ A. HURTADO ALBIR, *Traducción y traductología: Introducción a la traductología*, Madrid, 2001.

⁶ A. HURTADO ALBIR, *Traducción*, cit., “cultural elements characteristic of a culture present in a text and which, due to their specialized character, can cause translation problems” (our translation).

⁷ P. NEWMARK, *A Textbook of Translation*, London, 1988.

⁸ C. NORD, *Translating as a Purposeful Activity*, London, 1997.

⁹ Ibidem.

¹⁰ D. KATAN, *Translating Cultures*, London, 2004.

¹¹ Ibidem.

¹² M. BAJČIĆ, D. GOLENKO, *Applying Large Language Models in Legal Translation: The State-of-the-Art*, in *International Journal of Language & Law*, vol. 13, pp. 171–196, 2024.

¹³ P. GIAMPIERI, *Legal Machine Translation Explained: MT in Legal Contexts*, Newcastle upon Tyne, 2023.

¹⁴ D. XU, *Self-regulation as a stronger predictor than motivation of translation competence*, in *Front. Psychol.* vol. 16, 2025.

¹⁵ J. HOUSE, *Translation Quality Assessment: Past and Present*, London, 2015.

¹⁶ A. PYM, *Redefining Translation Competence in an Electronic Age*, in *Meta*, 48(4), 2003, pp. 481–497.

¹⁷ M. GOTTI, *Linguistic Features of Legal Texts: Translation Issues*, in *Statute Law Review*, 37(2), 144–155, 2016.



author in the field, Deborah Cao, who considers the role of specialized legal concepts, specialized terminology and legal style and linguistic structures¹⁸.

Additionally, apart from the specific traits of this field, we must also discuss the implication of culture, more precisely the extent to which the legal culture of each legal system (civil or common law) influences the strategies employed in the translation of terms and expressions, the type of equivalence chosen as well as output efficiency and adequacy, as very well point out Piszcz and Sierocka, in an recent study, “the importance of cultural context of law and legal language noticeable – legal language depends on culture”¹⁹. If legal culture is indeed that important to legal language, can we pose the same question reversed: is language that important to legal culture? Moreover, Goddard provided a satisfactory answer, “language is the essence of law, since the law is substantially formulated through language”²⁰. In other words, cultural context and legal culture determines the creation of certain terms to cover those concepts and at the same time, without language that concepts could not find a materialized form, and legal translation needs both.

In the specialized literature regarding the translation of legal texts and of legal culture-bound words, there is an extensive debate upon the difference and the reach of what legal culture and legal tradition mean and how each category influences the choice of terminology used as well as the translation process, idea supported by researchers such as Jaakko Husa²¹. In this sense, Friedman (1969) gives a very insightful definition of how legal culture can be understood, namely “the network of values and attitudes relating to law (...) when, why and where people turn to law”²², in other words, arguing that legal culture can be understood as an element pertaining to the legal field, but strongly affected by outward sociological and psychological factors. In this vein, Husa gives a very strong argument upholding the idea that legal culture, unlike legal tradition, is closely linked to the field of sociology, nevertheless he states that apart from the sociological and psychological elements that determine a legal culture, there are also objective factors strictly regarding the legal and legislative field that encompass this very complex concept such as “legal norms, legal doctrines, judicial practices, the application of the law etc.”²³. We argue that legal culture is more intrinsically linked to sociology than legal tradition because unlike legal tradition that concerns itself more with inherited legal concepts, ideas, methods or institutions (e.g. Common Law, Civil Law, Islamic Law), legal culture primarily addresses questions such as what is the relationship that people have with the law, the courts, how law functions in practice etc.²⁴ This distinction between legal culture and legal tradition is particularly important in forensic linguistics and legal translation studies because understanding the legal tradition of the source legal system offers insights into what type of equivalents should be used (literal/functional) and analysing the legal culture permits the translator to comprehend the type of audience to which the target text will be addressed.

Legal culture, understood as a concept intrinsically linked to legal translation and legal linguistics, is made up of two core components, namely the exterior factors such as the sociological, religious and psychological elements of the macro culture of a society, factors which are even more visible when comparing two completely distinct cultures. For example, Far-Eastern cultures and American or European ones, or Middle Eastern ones and the legal and legislative component which can be at times similar, a very illustrative example being the link between civil legal systems around the world. Hence, we may deduct that there are similarities between major legal systems, despite the sociological or

¹⁸ D. CAO, *Translating Law*, in *The Journal of Specialised Translation*, vol. 9, 2007, pp. 135–136.

¹⁹ A. PISZCZ, H. SIEROCKA, *The Role of Culture in Legal Languages, Legal Interpretation and Legal Translation*, in *Int J Semiot Law* 33, 2020, p. 534.

²⁰ C. GODDARD, *Where legal cultures meet: Translating confrontation into coexistence*, in *Investigationes Linguisticae*, vol. XVII. Institute of Linguistics – Adam Mickiewicz University, Pozna, 2009, p. 174.

²¹ J. HUSA, *Legal Culture vs. Legal Tradition – Different Epistemologies?*, Maastricht European Private Law Institute Working Paper 2012/18.

²² M. LUO, *Law, Culture and Language: Challenges in Legal Term Translation from the Perspective of Comparative Legal Culture*, in *English Language Teaching and Linguistics Studies* 6(6), 2024, p. 15.

²³ J. HUSA, *Legal Culture vs. Legal Tradition – Different Epistemologies?* in *SSRN Electronic Journal*, 2012, p. 10.

²⁴ D. NELKEN, *Using the concept of legal culture*, in *Australian Journal of Legal Philosophy*, vol. 29, 2004, pp. 1–26.



psychological factors involved, that link two different legal cultures if the legal and legislative component is more important than the sociological one. In support to this argument, we bring the example of the Romanian civil legal system and the Japanese civil legal system²⁵, very similar in many major points, in spite of the clear and visible distinctions at a sociological, psychological and historical level. Thus, the similarities between two different legal cultures spring from the central place that the legal and legislative component hold in the *polysystem* of that legal culture, in detriment to the sociological, religious or psychological elements. On the other hand, if focus is principally directed towards religious or social concept or values in a certain legal culture, that differences between two legal cultures become present and evident. A very illustrative example to this argument is the discrepancy between the Romanian legal culture and the Turkish legal culture, the latter being a mixed product of secular values and the influence of old Islamic values, derived from the Sharia law. Legal tradition, on the other hand, refers mostly to historically inherited legal concepts that rule the way a legal system is constructed²⁶.

As such, given the clear influence that specific traits, either legal, social or psychological on the concepts present in each legal system, which in turn determine the use of a certain terminology to cover those concepts, we can state that the field of comparative law is essential in the translation of legal texts from a source language and legal culture to a target one. Just as G  mar²⁷ states in Goddard, “the translator should combine the competences of a comparative jurist and the know-how of the linguist”²⁸. Hence, comparative law is an inherent part of the translation of legal texts, without which it would be completely impossible to produce an efficient and correct translation. In accordance with this statement, I would ask three important questions, pertaining to this research: firstly, are MT translations of legal texts, more specifically of criminal law judgements from English into Romanian accurate enough? Secondly, do they respect the principles of acceptability, accuracy and adequacy and what are the main errors that we may encounter when we analyse MT translations of legal texts? Lastly, what is the difference between machine translation and human translation in specialized texts, more specifically in the legal texts, to what extent can we find differences when we analyse AI and MT translation quality in the translation process of different fields from English into other target languages and legal cultures?

In order to answer the first question, we must delve deeper into how legal culture is transposed into language, how this influences the translation process and especially its quality in the evaluation of quality process. In that sense, we must provide more complex insights into legal terminology and the most important and problematic part, especially when talking about legal translation as far as the source is concerned (human or machine translation), and that is legal culture-bound words. Generally, culture-bound words or *culturemes* represent a major difficulty in the translation process, even when the text is a general and non-specialized one. The difficulties become even more poignant when the text is a specialized one, and even a legal one. Just as general language covers concepts that are specific to a certain society, mentality and culture, legal language covers concepts that are specific to a certain legal culture and to express and render them into another legal language represents a fastidious endeavour, especially when the translator is not a jurist and has little knowledge of the concepts present in the text and their position in the legal *polysystem* as well as their relationship with other legal concepts from other legal systems. In order to achieve acceptability as well as adequacy, two major points when talking about equivalent and translation studies discussed by acknowledged researchers such as Gideon Toury (1995)²⁹ who introduced the distinction between adequacy and acceptability and defined them as

²⁵ *Note of the Author*: despite the very striking similarities between such different legal cultures, derived mainly from the importance that the two legal systems put on legislative concepts, codified laws and doctrine, there still are a few notable differences stemming from East Asian legal and moral tradition as well as the mix of civil and common law as far as certain legal practices and legal concepts are concerned due to evident historical reasons. However, these differences are not so apparent as those posed by Sharia-influenced legal cultures and systems.

²⁶ J. HUSA, *Legal Culture vs. Legal Tradition – Different Epistemologies?*, cit., p. 16.

²⁷ J.C. G  MAR, *La traduction juridique: Art ou technique d'interpr  tation?*, in *Meta: Translators' Journal*, vol. 33, no. 2, p. 310.

²⁸ C. GODDARD, *op. cit.*, p. 170.

²⁹ G. TOURY, *Descriptive translation studies and beyond*, Amsterdam, 1995.



essential concepts in translation³⁰. As far as these concepts can be linked specifically to legal translation, authors such as Prieto Ramos³¹ or Šarčević³² discuss these concepts in relation to how functional equivalence can be achieved in legal specialized translation and how the product can be assessed according to these standards and criteria.

Thus, we wish to research the solutions that can be provided in the exact rendering of legal culture-bound words, thus avoiding major errors in translation, such as loss or mistranslation. The concept of compensation in translation has been approached by Peter Newmark, defining it as the strategy that covers losses in translation and thus produces a relatively similar effect in the target language text, without making use specifically only to literal translation, but rather leaning towards strategies and methods such as dynamic equivalence and adaptation³³. Cultural adaptation is a concept tackled by Vinay, Darbelnet³⁴, defined as a strategy used in the situation in which there is no direct equivalent for a concept from the source language in the target language, especially in culturally discrepancies³⁵. Additionally, paraphrasing is another strategy to which Eugene Nida makes reference in relation to how it facilitates dynamic equivalence and a product that sounds natural and adequate in the target language³⁶.

Before analysing the problems inherent to the process of translation as well as the strategies and methods employed to tackle these problems, we shall define and expand to the existent knowledge regarding the central concept that will drive most of the literature review and the case study, namely culture-bound words, and more specifically in this case, legal culture-bound words or *culturemes*. According to Rotaru (2019), they are “terms or expressions present in the source legal system, but non-existent in the target legal system (...), (they) can be collectively called legal *realia*”³⁷. However, the unique nature of legal culture-bound words is that they are in fact specialized legal terminology, part of a text that unlike general texts, cause serious legal consequences³⁸. In this regard, due to the presence of culture-bound words, as Snell-Hornby mentions, “the translation is no longer linguistic substitution (...), but a cultural transfer”³⁹. In the same vein, this idea that legal translation becomes a process so much more complex than simply finding the right literal equivalent, is supported by Peña (2007) “cultural equivalence focuses on how correspondences interpret a given item and draw the same cultural meaning”⁴⁰. In this case, we must highlight the importance that the equivalents chosen by the legal translator must convey, in the most fortunate case the entire meaning or if not an as close as possible to the original meaning, in terms of accuracy, and in terms of adequacy, they transmit the same legal effect and produce the same legal consequences as the original text.

Regarding the translation of legal culture-bound words, there are three main problems that arise and are worth discussing, according to Rotaru: 1.) the conceptual problems (understanding the similarities and differences at a conceptual level between two different legal systems), 2.) the problems of equivalence (finding the right terminology to cover specific concepts, highly dependent on the legal

³⁰ In Gideon Toury's book, adequacy is viewed as the translator's effort to maintain the target text as close as possible to the source text, both in terms of style, content, terminology and effect, adhering to the source language and culture norms whereas acceptability is defined as the tendency to respect target language and culture norms. G. TOURY, *op. cit.*

³¹ F. PRIETO RAMOS, *Revisiting translator competence in the age of artificial intelligence: the case of legal and institutional translation*, in *The Interpreter and Translator Trainer* 18(1), pp. 148-173, 2024.

³² S. ŠARČEVIĆ, *New Approach to Legal Translation*, London, 1997.

³³ P. NEWMARK, *A Textbook of Translation*, cit., p. 90.

³⁴ J.-P. VINAY, J. DARBELNET, *Comparative Stylistics of French and English*, Amsterdam, 1995.

³⁵ J.-P. VINAY, J. DARBELNET, *op. cit.*

³⁶ E. NIDA, *Toward a Science of Translating: With Special Reference to Principles and Procedures Involved in Bible Translating*, Leiden, 1964.

³⁷ M.C. ROTARU, *Handling English culture-bound terms in Legal Translation: a compare-and-contrast approach*, in *Buletinul Științific al Universității Tehnice de Construcții București Seria: Limbi Străine și Comunicare* 12 (2), 2019, p. 63.

³⁸ P. KUSIK, *Comparative Law in the Eyes of Translation Scholars. Is Legal Translation Really an Exercise of Comparative Law?*, in *HERMES Journal Language and Communication in Business*, 2024, p. 115.

³⁹ M. SNELL HORNBY, *Translation studies: an integrated approach*, in S. BASSNETT, A. LEFEVERE (eds.), *Translation, History and Culture*, London, p. 319.

⁴⁰ E.D., PEÑA, *Lost in Translation: Methodological Considerations in Cross-Cultural Research*, in *Child Development*, 78 (4), 2007, p. 1256.

culture and using the correct translation strategies in order to achieve accuracy and adequacy) and lastly 3.) problems of ambiguity (which arise mostly due to major, insurmountable distinctions between two legal cultures and the inability to transpose each detail into the target language)⁴¹, as De Groot (1996) expresses “when target language and the source language relate to two different legal systems, absolute equivalence is impossible”⁴². Hence, the solution proposed by the author is resorting to approximate equivalence⁴³, although it is so much more difficult and inappropriate to use such as an inexact strategy of translation when translating texts pertaining to the legal field. The reason for it is mainly the major objective and characteristic of legal texts, that of being precise, impersonal, informative and objective. Authors such as Carretero González discuss the technicity, inflexibility and precision of the legal language, considering it a *technolect*⁴⁴. On the other hand, researchers such as Fiodorov offer a distinct view of legal language, comprehending it beyond its clear formal character, as rather something influenced by external factors and in continuous change and in a fluid dynamic, calling it a *sociolect*⁴⁵.

In order to tackle the above-mentioned translation problems as far as legal culture-bound words are concerned, one of the most evident strategies used by MT and AI apps in specialized translation, more specifically in legal translation is terminology consistency, which is also considered the most important advantage that this approach offers. Another strategy used by MT and AI apps is controlled language use which focuses on the employment of the strict terminology, syntax simplification and impersonal style, from which we can conclude that MT and AI apps would rather use literal translation than dynamic equivalence. In this regard, two are the methods or approaches that Wilson mentions: the functional method and the pragmatic approach⁴⁶. The functional approach is based on the idea that there is a certain common ground between legal cultures and systems, which could bridge the probability to find adequate equivalents and ease the process of cultural adaptation and dynamic equivalence⁴⁷. The pragmatic approach is closely linked with the functionalist movement, focusing more on the effect it has on the target audience and how the legal effect can be preserved in order to produce the same consequences; it is also known as “idiomatic translation”⁴⁸. The functional method is also supported by Kusik (2024) which describes the main objective of legal translation as the rendering of the exact meaning and the producing of the same legal effects, “to produce a text which expresses the meaning and achieves the legal effects intended by the ‘author’”⁴⁹. What really offers the legal translator the means to provide the text with functional equivalents, according to Kusik⁵⁰, is the inherent knowledge of comparative law. This in turn can facilitate the choice between several possible translation strategies such as explanatory translation or lexical expansion, loan translation or borrowing, descriptive substitution and cultural adaptation.

3. The particularities of AI or machine translation of legal texts and legal culture-bound words

The subject of the fluency, accuracy and adequacy of machine translation of general and specialized texts is of great debate and interest in translation and terminological studies at the moment. Unlike adequacy, which is a concept coined by Gideon Toury, accuracy, in translation studies and in

⁴¹ M.C. ROTARU, *op. cit.*, p. 63.

⁴² G. R. DE GROOT, *Het vertalen van juridische informati*, Deventer, 1996, p. 157.

⁴³ *Op. cit.*, p. 157.

⁴⁴ C. CARRETERO GONZÁLEZ, J. C. FUENTES GOMÉZ, *La claridad del lenguaje jurídico*. in *Revista del Ministerio Fiscal*, vol. 8, 2019.

⁴⁵ V. FIODOROV, *Statutul și tipologia limbajului juridic*, in *Noi tendințe în predarea limbajelor de specialitate în contextul racordării învățământului superior la cerințele pieței muncii*, pp. 73–78, Chișinău, 2018.

⁴⁶ P. E. WILSON, *Comparative law outside the ivory tower: an interdisciplinary perspective*, in *Legal Studies* 43 (4), 2023, p. 646.

⁴⁷ The concept of dynamic equivalence has been introduced by Eugene Nida (1964) and refers to the strategy according to which the translator must strive to maintain as much as possible the original meaning of the source text even if he has to alter formal aspects (E. NIDA, *Toward a Science of Translating*, cit.)

⁴⁸ P. E. WILSON, *op. cit.*, p. 656.

⁴⁹ ŠARČEVIĆ, *New Approach to Legal Translation*, cit., pp. 72–73, in P. KUSIK, *op. cit.*, p. 115.

⁵⁰ P. KUSIK, *op. cit.*



applied linguistics is not a matter that is discussed in Toury's works, but rather in House⁵¹ and in Williams⁵². Should we approach these concepts from a terminological point of view, Cabré, terminological accuracy can be assessed based on the degree to which the specialized, in this case, the legal meaning is being conveyed.⁵³

Recent studies and researchers, such as Wiesmann⁵⁴ and Giampieri⁵⁵, focus and bring to light new arguments concerning the efficiency of machine translation and the probability of it replacing human translation, due to the high level of quality objectively evaluated. However, we would argue that machine translation, despite the wide range of specialized terminology possessed by it and the new improvement regarding style and fluency, it has still not acquired the capacity to resort to adaptation in a way human translation does and therefore, at least in the short run, it shall not completely replace human translation, but rather act as a very useful instrument that will enhance the quality of human translation as far as terminology quality and diversity and consistency is concerned.

Firstly, we must introduce a very important information as to the categories of machine translation used at the moment and their specificities. In this regard, we can mention the statistical machine translation (SMT) which is a better choice for the translator when seeking terminology consistency based on statistical researches, such as MATECAT. However, this type of machine translation, due to it being based on linguistic comparisons and parallels, can produce biased legal equivalents that do not portray accurately the meaning of a certain concept specific to the SL legal culture⁵⁶. On the other hand, the most relevant and important machine translation used at present is the neural machine translation (NMT), amongst which we mention a very important translation instrument, used worldwide, namely DeepL. In this regard, scholars such as Nunes Vieira et al. state that NMT⁵⁷ has a lot of advantages and has improved consistently compared to how SMT works and as far as specialized equivalents are concerned, "NMT generated fluent and idiomatic translations, increased fluency, adequacy and accuracy of target texts"⁵⁸. Killman⁵⁹ is one of the most relevant researchers who investigated the way in which machine translation and in particular, neural machine translation works and the quality of the translation produced by these two translation instruments. Alongside Killman, Heiss and Soffritti also discuss the advantages of using MT and NMT both stating that they noticed "promising results with regard to legal texts"⁶⁰.

Nevertheless, there still remain a few drawbacks that machine translation is not fully solved to this day, amongst which the inability to tackle long and ambiguous expressions and phrases, the production of excessive "repetitions, omissions, additions, words that make no sense (whatsoever) in the context"⁶¹. We can conclude thus that despite the incredible benefits which NMT can bring to the development of translation and terminology studies, to the specialized translation field and quality

⁵¹ J. HOUSE, *op. cit.*

⁵² M. WILLIAMS, *Translation Quality Assessment*, in *Mutatis Mutandis*, vol. 2, no. 1, 2009, pp. 3–23.

⁵³ M.T. CABRÉ, *Terminology: Theory, Methods and Applications*. Amsterdam, 1999.

⁵⁴ E. WIESMANN, *op. cit.*

⁵⁵ P. GIAMPIERI, *op. cit.*

⁵⁶ P. GIAMPIERI, *op. cit.*, p. 3.

⁵⁷ Neural Machine Translation (NMT) is a machine translation strategy used by AI networks, encompassing state of the art technology and advanced learning systems to produce more a qualitative target output. J. MOORKENS, *What to Expect from Neural Machine Translation: A Practical In-Class Translation Evaluation Exercise*, in *The Interpreter and Translator Trainer*, vol. 12, no. 4, 2018, pp. 375–387.

⁵⁸ L.N. VIEIRA, M. O'HAGAN, C. O'SULLIVAN, *Understanding the societal impacts of machine translation: A critical review of the literature on medical and legal use cases. Information, Communication & Society*, in *Information, Communication & Society*, 24(11), 1515–1532.

⁵⁹ J. KILLMAN, *Vocabulary accuracy of statistical machine translation in the legal context*, in S. O'BRIEN, M. SIMARD, L. SPECIA (eds.), *Proceedings of the 11th Conference of the Association for Machine Translation in the Americas*, Vancouver, 2014, pp. 85–98.

⁶⁰ C. HEISS, M. SOFFRITTI, *DeepL Traduttore e didattica della traduzione dall'italiano in tedesco: Alcune valutazioni preliminari*. in *TRAlinea Online Translation Journal*, 2018; E. WIESMANN, *Machine Translation in the Field of Law: A Study of Italian–German Legal Texts*, in *Comparative Legilinguistics International Journal for Legal Communication*, 37, 2019, p. 125.

⁶¹ E. WIESMANN, *Machine Translation in the Field of Law: A Study of Italian–German Legal Texts*, in *Comparative Legilinguistics International Journal for Legal Communication*, 37, p. 124, 2019.

assessment as well as to the integration of comparative legal knowledge used in legal translations, the presence of a human translator cannot be omitted at least as far as post-editing is concerned. Given the recent evolution of the profession, a legal translator's role resides not only in performing the translation act itself, but rather in assuring quality in terms of acceptability, accuracy and adequacy, both on a formal and on a content level⁶². In this sense, the role of post-editor emerges, focusing on how the human translators can improve the content generated by MT or NMT and especially, making the necessary changes in terms of cultural adaptation and legal appropriation⁶³.

Unfortunately, or not, it can be predicted that machine translation will be more and more present in the translation pursuits and will be even more improved in terms of terminology accuracy, adequacy and consistency over time, including as far as specialized highly difficult to translate and comprehend texts are concerned, such as legal and medical ones. Although, machine translation still presents several impediments due to its current inability to process legal information and adapt it to the context of the target language text and legal culture, it still remains a useful tool and is expected to develop in ways translation study researchers still do not predict. Hence, the revaluation of the role that a legal translator plays in the current state of the field is imperative and requires a transition or a continuum from the role of sole translator to the role of post-editor who ensures that the communicative and dynamic role of a translation, even in specialized fields, in particular in the translation of law and legal texts is accomplished by a machine translation program. Some other roles that could be undertaken and developed under the current situation is that of researcher in translation studies and of quality assurance evaluator of machine translation products.

Finally, in terms of errors that can be encountered when discussing MT or NMT translation, the main mistakes identified by Koehn & Knowles are omission, lexical and terminological ambiguity, mistranslation of very specialized legal terms, lack of cultural adaptation to the target legal system and lastly, a general lack of consistency⁶⁴. We will be approaching and analysing whether these errors are present also in the MT translation of the judgements provided in the case study part.

4. Case study. A human and machine translation brief analysis of criminal law judgements from the Crown Court

4.1. Case description and methodology

Our research and in particular this case study means to analyse the differences between a human-produced translation of a criminal law judgement from the Crown Court⁶⁵ with a focus on the translation of legal culture-bound words and a machine translation-produced one, with a focus on the translation from English into Romanian. Recent studies concerning legal translation, comparative law and the impact of AI on translation studies investigate and offer new interesting insights into how calque and literal translation might severely affect the result of a legal translation with such a great impact, such as criminal judgements. One of the authors who discusses the matter

According to Graziadei, criminal judgements, from a result and responsibility point of view are not so recurrent as the translation of laws and doctrine⁶⁶. In this regard, the author mentions that

⁶² J. LEIVA ROJO, *Aspects of human translation: the current situation and an emerging trend*, in *Hermēneus Revista de traducción e interpretación*, vol. 20, 2018, pp. 257-294.

⁶³ M. KOPONEN, *Is machine translation post-editing worth the effort? A survey of research into post-editing and effort*, in *The Journal of Specialised Translation*, vol. 25, pp. 131-148, 2016.

⁶⁴ P. KOEHN, R. KNOWLES, *Neural machine translation and the evaluation of its output*, in *Machine Translation*, vol. 31, no. 1-2, 2017, pp. 3-13.

⁶⁵ The Crown Court is main criminal court that judges severe criminal offences, sentences offenders and tries appeals in England and Wales. It holds a superior position in the courts' system than the Magistrates' Court but an inferior one comparing to the Court of Appeal, Criminal Division. The principal offences heard in this court are serious ones such as murder, femicide, rape or money laundering (Courts and Tribunals Judiciary, URL: <https://www.judiciary.uk/>).

⁶⁶ M. GRAZIADEI, *Legal Translation and the Quest for Authenticity*, in *Int J Semiot Law* 38, 2025, p. 2577.



strategies such as calque and literal translation, stemming from linguistic comparison and mainly employed by machine translation apps, and undoubtedly disadvantageous for legal translations because “similar sounding words may not convey the same legal notions”⁶⁷, a strategy suggest by Graziadei (2025) being the creation of new terms that would suit the legal cultural context, namely coining new words to express untranslatable legal concepts⁶⁸, mainly induced by the structural difference between legal cultures and systems.

As far as the corpora chosen to be analysed is concerned, we have selected a series of recent and relevant criminal law judgements from the Crown Court⁶⁹, the highest tribunal as far as criminal law cases are concerned, with a focus on legal culture-bound words. In this regard, the body of texts that we have selected, namely judgements, are part of a second group of legal texts according to Šarčević’s (1997) taxonomy, also known as “prescriptive parts”, including all types of legal instruments⁷⁰. As to the level of difficulty of the texts chosen, all present the same degree of translation and comparative legal knowledge, pertaining also to the same category of legal texts and being produced by the same legal institution, only the length of each text being a matter of variation, ranging from a minimum of 20 pages to a maximum of 80 pages. The language pair chosen to be analysed is English-Romanian due to the distinctions found at a systemic and content level, in terms of legal culture-bound words, which in turn determines the difficulty in legal translation in the case of this pair⁷¹.

4.2. Case analysis, discussion and findings

Given all the information discussed and analysed in the literature review part, we shall provide a thorough investigation of the differences between machine translation (the MT app used is DeepL) and human translation in relation to the criminal law judgements from the Crown Court. Additionally, I will explain the solutions offered by the MT app, the methods and strategies employed, and lastly to comment upon the product or the final target text, on errors and on innovative solutions and to give a final opinion on the role of the translator in the AI era in the specialized translation field, in the legal translation field and on the role of comparative law in translation studies.

Judgement 1: LORD STEPHENS AND SIR DECLAN MORGAN (with whom Lord Lloyd Jones, Lord Burrows and Lady Simler agree)⁷²

Source Text	Target Text ⁷³
This appeal deals with the circumstances in which a District Judge (Magistrates’ Courts) in Northern Ireland may reopen a case in which sentence has been passed in order to impose a different outcome . Section 142 of the Magistrates’ Courts Act 1980 (“the 1980 Act”) contains an identical provision so the outcome is also relevant to Magistrates’ Courts in England and Wales .	Prezentul recurs vizează circumstanțele în care un judecător de district (Tribunalele de primă instanță) din Irlanda de Nord poate redeschide un dosar în care s-a pronunțat deja o sentință, în vederea pronunțării unei hotărâri diferite . Secțiunea 142 din Legea privind instanțele de magistratură din 1980 („Legea din 1980”) conține o dispoziție identică, astfel

⁶⁷ M. GRAZIADEI, *op. cit.*, p. 2577.

⁶⁸ *Ibid.*

⁶⁹ The date of the criminal judgements range from 2022-2025, are relevant due to their recent issuing as well as to the fact that they contain very illustrative examples of criminal law culture-bound words, diverse in variety, which also offered various equivalents when translated with MT.

⁷⁰ S. ŠARČEVIĆ, *New Approach to Legal Translation*, cit., p. 11.

⁷¹ D. UNGUREAN-MITROI, *Legal Translation Landscapes: The Unique Case of Romania(n) and English Pair of Languages*, in *Studii de Știință și Cultură*, vol. 1, no. 91, pp. 91-98, 2024.

⁷² Source: The Supreme Court of the UK, URL: <https://supremecourt.uk/cases>.

⁷³ Source: text produced with DeepL.



Background 2. On 28 June 2021 the respondent pleaded guilty at Ballymena Magistrates' Court to possession of an offensive weapon in a public place, common assault, and criminal damage. The District Judge adjourned the case for the preparation of a probation report. The criminal damage charge related to damage to the home of a person who was unknown to the respondent and in her statement to police the homeowner undertook to forward the repairs estimate to police when received.	încât rezultatul este relevant și pentru instanțele de magistratură din Anglia și Țara Galilor. Context 2. La 28 iunie 2021, pârâta a pledat vinovată la Instanța de Magistratură din Ballymena pentru deținerea unei arme ofensive într-un loc public, agresiune simplă și distrugere. Judecătorul districtual a amânat cauza pentru întocmirea unui raport de probațiune. Acuzația de distrugere se referea la pagubele aduse locuinței unei persoane necunoscute pârâtului, iar în declarația sa dată poliției, proprietarul locuinței s-a angajat să transmită poliției devizul de reparații imediat ce îl va primi.
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Judgement 2: Pwr (AP) (Appellant) v Director of Public Prosecutions (Respondent)⁷⁴

Source Text	Target Text ⁷⁵
Counsel for the appellants, Joel Bennathan QC, submitted that, applying the strong common law presumption of mens rea, section 13(1) is not an offence of strict liability. (...) But there was no mention by the Divisional Court of Page 20 that decision by the magistrate so that this is a very slender basis on which to say that the need for a mens rea was always well-understood. (...) No such offence existed when the conduct for which Mr Hayes and Mr Palombo were prosecuted took place. In their cases, as in all the prosecutions brought by the SFO relating to attempts to influence LIBOR or EURIBOR, the offence charged was conspiracy to defraud. (...) Because the burden of proof was on the prosecution to prove that the defendants had made or conspired to make false or fraudulent statements, this meant that, to establish falsity, the prosecution had to show that the panel bank making the submission could not have borrowed funds at the rate submitted. The application was referred to a full Court of Appeal by the Registrar. The Court of Appeal refused leave to appeal.	Avocatul recurenților, Joel Bennathan QC, a susținut că, aplicând prezumția puternică de mens rea din common law, secțiunea 13(1) nu constituie o infracțiune de răspundere strictă. (...) Însă Curtea Divizională nu a făcut nicio referire la acea decizie a magistratului de la pagina 20, astfel încât acesta este un temei foarte fragil pe baza căruia să se afirme că necesitatea existenței unei intenții criminale a fost întotdeauna bine înțeleasă. O astfel de infracțiune nu exista la momentul la care a avut loc fapta pentru care au fost urmăriți penal domnul Hayes și domnul Palombo. În cazurile lor, ca și în toate urmăririle penale inițiate de SFO referitoare la încercările de a influența LIBOR sau EURIBOR, infracțiunea imputată a fost conspirația în scopul fraudării. (...) Deoarece sarcina probei revenea acuzării, care trebuia să demonstreze că inculpații au făcut sau au conspirat pentru a face declarații false sau frauduloase, aceasta însemna că, pentru a stabili falsitatea, acuzarea trebuia să demonstreze că banca din comisie care a făcut propunerea nu ar fi putut împrumuta fonduri la rata propusă. Cererea a fost trimisă Curții de Apel în complet de către grefier. Curtea de Apel a refuzat permisiunea de a face apel.

⁷⁴ Source: The Supreme Court of the UK, URL: <https://supremecourt.uk/cases>.

⁷⁵ Source: text produced with DeepL.

Judgement 3: R v Maughan (Northern Ireland)⁷⁶

Source Text	Target Text ⁷⁷
The appellant pleaded guilty at arraignment on charges of aggravated burglary and stealing, false imprisonment, burglary, attempted burglary and allowing himself to be carried at Downpatrick Crown Court on 14 September 2017. The abolition of committal in England and Wales meant that cases were transferred to the Crown Court very quickly, in some instances within days. (...) Where a person is charged the accused is brought before a Sheriff as soon as possible, usually within a day, when bail or remand is considered. By section 76 of the Criminal Procedure (Scotland) Act 1995 where an accused person intimates in writing that he intends to plead guilty and desires to have his case disposed of at once he may be served with an indictment with a notice to appear at the appropriate court not less than four days after the date of the notice. (...) Proceedings for an offence are instituted at the earliest of the following times - when a summons or warrant is issued. Admissions at interview have been considered sufficient but correspondence from solicitors to the Public Prosecution Service or an indication at court during a remand would also be sufficient to trigger the obligation under article 33. Any reduction in discount where the offender has been caught red handed has long been recognised as a feature of sentencing practice throughout the United Kingdom.	La prima înfățișare, care a avut loc la Curtea Coroanei din Downpatrick la data de 14 septembrie 2017, recurentul și-a recunoscut vinovăția în ceea ce privește acuzațiile de furt calificat și furt, sechestrare de persoană, spargere, tentativă de spargere și acceptarea transportului. Abolirea trimiterii în judecată în Anglia și Țara Galilor a însemnat că dosarele erau transferate la Crown Court foarte rapid, în unele cazuri în câteva zile. (...) În cazul în care o persoană este pusă sub acuzare, aceasta este adusă în fața unui șerif cât mai curând posibil, de obicei în termen de o zi, moment în care se ia în considerare eliberarea pe cauțiune sau arestarea preventivă. În temeiul articolului 76 din Legea privind procedura penală (Scoția) din 1995, în cazul în care un acuzat indică în scris că intenționează să pledeze vinovat și dorește ca cauza sa să fie soluționată imediat, i se poate comunica un act de acuzare însoțit de o citație de a se prezenta la instanța competentă în termen de cel puțin patru zile de la data notificării. (...) Procedura penală se inițiază la prima dintre următoarele date: atunci când se emite o citație sau un mandat. Mărturisirile făcute în cadrul interogatoriului au fost considerate suficiente, dar corespondența dintre avocați și Parchetul Public sau o indicație dată în instanță în timpul unei audieri preliminare ar fi, de asemenea, suficiente pentru a declanșa obligația prevăzută la articolul 33. Orice reducere a pedepsei în cazul în care infractorul a fost prins în flagrant a fost recunoscută de mult timp ca o caracteristică a practicii de stabilire a pedepselor în întreg Regatul Unit.

The target text, produced with a very well-known machine translation application, poses a great deal of translation problems and questions that welcome the debate and explain and cover the information presented in the literature review part. Moreover, the translation into Romanian that presents interesting difficulties are the names of institutions or offices, in this case, the equivalents *judecător de district* is a literal translation into Romanian of the English term *District Judge* and is completely correct and adequate in the context, proving that sometimes literal translation is the only acceptable choice to make and the machine translation program did a satisfactory job. However, there are several equivalents into Romanian such as *instanțele de magistratură*, incorrectly translated by using a false friend (in Romanian a magistrat refers to both the judge and the prosecutor, yet in English the magistrate is only the judge who serves in lower courts) or *Curtea Coroanei* which can also be found in the same paragraph into the target text with the borrowed English term Crown Court. These examples show the lack of

⁷⁶ Source: The Supreme Court of the UK, URL: <https://supremecourt.uk/cases>.

⁷⁷ Source: text produced with DeepL.



consistency in relation to machine translation in legal translation, nevertheless it still does not represent a problem that cannot be solved with the revision of a specialized translator. However, *Magistrates' Courts* has not only been translated as *instanțe de magistratură*, but also as *tribunale de primă instanță*, showing that machine translation can at times use the comparative law knowledge⁷⁸ that it disposes of by offering complementary explanations or substituting the term with a correct paraphrase of the concept in the target language.

In the same vein, another illustrative example of how a public institution's name was inaccurately translated by machine translation is the term *Public Prosecution*, encountered in the target text as *Parchetul Public*, a term which does not exist in the Romanian language and can be entirely considered as a calque from English. The correct term utilised for this institution is *Ministerul Public*, a concept encountered also in other Romance languages (*pubblico ministero* in Italian). In the Romanian judicial system, *Parchet* is the place where a prosecutor works and not the institution in itself. Another interesting example is the translation of the extremely debated term *solicitor* into Romanian as *avocat*. Given that in all civil legal systems, there is no distinction between types of attorneys, we cannot discuss about two major concepts that exist in common law, the barrister and the solicitor. In this sense, machine translation has chosen to use the umbrella term that encompasses all types of lawyers. In our opinion, the choice was wise and easily to explain if we touch upon the functionalist approach and the dynamic equivalence view because it offers the text adequacy to the target legal culture and it does not produce different legal consequences. The use of a borrowed word, as an alternative, would have been strange and would have made the text sound inappropriate.

There are a few legal concepts specific only to the common law system and legal culture that were borrowed completely by using the literal translation strategy. This is the case of the term *sheriff*, translated in the target text as *șerif*, a culturally appropriated term, the only term that could have transmitted the original message and kept the accuracy of the text, given that this concept does not exist in the Romanian civil legal culture and system. This strategy (also found in the specialized literature as foreignization in translation⁷⁹, that the machine translation program used is based on the opinion that it is acceptable to coin new words in the specialized language if there is no suitable alternative and if it is accompanied by an explanatory text. The only aspect in which machine translation completely lacks of competence is producing explanatory texts in footnotes or in brackets for certain concepts that were culturally appropriated or for words that were coined and are not widely known in the target legal culture and system.

As far as style is concerned or the choice of some equivalents, based on the source texts and their translation provided by a machine translation program, we can draw the conclusion that AI still has difficulties in transferring the style or the tone of the source text into the target text as well as choosing between various equivalents, based on context. This is the case of the term *offender* translated as *infractor*, a word that pertains in Romanian mostly to the casual register rather than the legal or the criminal law language, a better equivalent for it being *inculpat*. However, sometimes, machine translation can make very good and evidence-based translation choices, being the case of the translation of the term interview as *interogatoriu*. Normally, an underdeveloped AI program would have translated literally the term into Romanian as *interviu*, the first meaning of the term interview, yet it chose the

⁷⁸ Although MT applications/ NMT do not directly possess legal knowledge or the ability to distinguish between complex legal concepts in order to make accurate and consistent choices, yet due to the large legal source of documents that comprise the corpora found in MT/NMT apps, they distinguish and use some legal concepts which have a high occurrence, even if not consistently (D. GUZMÁN, F. PRIETO RAMOS, *Human and Machine Translation of Legal Terminology in International Institutional Settings*, in *Language and Law*, 2024). Additionally, the existence of terminology databases and MT memories available online favour this phenomenon (MD M. IBN ALAM, et al., *On the Evaluation of Machine Translation for Terminology Consistency*, in *Arxiv*, 2021, available at: <https://arxiv.org/abs/2106.11891>).

⁷⁹ *Foreignization* and *domestication* are two fundamental concepts in translation studies coined by Lawrence Venuti (1995) with regard to alternative strategies to find equivalents. In this sense, foreignization refers to borrowing words and concepts from the source language, text and culture in order to avoid cultural adaptation and to preserve clarity and accuracy. On the other hand, the strategy of domestication rather focuses on adapting foreign concepts to the reality presented by the target text, language and culture in order to make it adequate and acceptable to the target audience (L. VENUTI, *The Translator's Invisibility: A History of Translation*, London, 1995).



specialized meaning, proving that machine translation comprehends sometimes even if inconsistently the context and the legal culture behind it and makes the distinction between a general discourse text and a specialized one.

5. Conclusions

The results that we have come to by studying and thoroughly analysing the literature review available regarding machine translation, legal translation, legal culture-bound words and how to render them accurately and adequately in any target language filled a very large and important gap in this part of the scientific field of translation studies and comparative law. In this regard, the examples provided in the case study part were a welcomed contribution which supported the main ideas provided in the theoretical part and the opinion expressed by the author. The limitations of this research lie in the fact that we have not been able to provide a comparison of equivalents.

As a conclusion, the major ideas that can be drawn from this analysis are the following:

- 1.) Comparative law is essential when taking into consideration the translation of legal text. This opinion can be supported by the argument according to which culture-bound words cannot always be translated with the use of literal equivalents but rather by using a functional method, focused on the adequacy of the target text to the needs of the target audience, but also preserving the same legal effects, in the case of legal texts. In the case study part, we have brought illustrative examples that showed the necessity to use cultural adaptation in the case of legal culture-bound words such as names of offices (sheriff, magistrate, solicitor) or names of institutions etc.
- 2.) Style and tone are a very important aspect even in legal translations. Choosing the correct and appropriate equivalent is a matter of understanding the context and the idea that the source text wants to convey. Most languages offer alternative equivalents and synonyms, in legal translation we must be careful to choose between specialized legal terms and words that belong to the general register. An example to this end may be the general register term in English criminal and its counterpart offender, in Romanian the translation for criminal would be *criminal* and for offender would be *infractor*.

Machine translation and AI-produced translation is a viable solution only if it is accompanied by the post-editing and revision of a human trained and specialized translator. The main error encountered were the same mentioned by other authors that conducted research studies on the topic, namely: omission and repetitions, lack of consistency in terminology, using literal translation at times, failing to match the register with the original *skopos* of the target text.

Bibliography

ABDELAAL, N., AL SAWI, I., *A comparative evaluation of machine translation vs. human translation for legal texts: a case study of translations between English to Arabic*, in *Comparative Legilinguistics International Journal for Legal Communication*, 63, 2025, pp. 186–223, DOI: <https://doi.org/10.14746/cl.2025.63.1>.

AIXELÁ, J.F., *Culture-Specific Items in Translation*, in R. ÁLVAREZ, M. C. A. VIDAL (eds.), *Translation, Power, Subversion*, Clevedon, 1996.

BAJČIĆ, M., GOLENKO, D., *Applying Large Language Models in Legal Translation: The State-of-the-Art*, in *International Journal of Language & Law*, vol. 13, pp. 171–196, 2024.

BOTEZATU, N.V., *Comparative Law and Legal Translation*, in *Journal of Danubian Studies and Research*, 6(2), 2016, pp. 189–195.

- CABRÉ, M.T., *Terminology: Theory, Methods and Applications*. Amsterdam, 1999.
- CAO, D., *Translating Law*, in *The Journal of Specialised Translation*, Clevedon, 2007.
- CASTILHO, S., et al, *Is Neural Machine Translation the New State of the Art?*, in *The Prague Bulletin of Mathematical Linguistics*, 108, 2017, pp. 109–120.
- DE GROOT, G. R., *Het vertalen van juridische informati*, Deventer, 1996.
- ENGBERG, J., *Comparative Law for Legal Translation: Through Multiple Perspectives to Multidimensional Knowledge*, in *International Journal for the Semiotics of Law - Revue internationale de Sémiotique juridique* 33(2), 2020, pp. 1-19.
- FIODOROV, V., *Statutul și tipologia limbajului juridic*, in *Noi tendințe în predarea limbajelor de specialitate în contextul racordării învățământului superior la cerințele pieței muncii*, Chișinău, 2018.
- GEMAR, J.C., *La traduction juridique: Art ou technique d'interprétation?*, in *Meta: Translators' Journal*, vol. 33, no. 2, pp. 304–318, DOI: <https://doi.org/10.7202/002850ar>.
- GIAMPIERI, P., *Legal Machine Translation Explained: MT in Legal Contexts*, Newcastle upon Tyne, 2023.
- GODDARD, C., *Where legal cultures meet: Translating confrontation into coexistence*, in *Investigationes Linguisticae*, 16, Pozna, 2009, pp. 168-205, DOI: 10.14746/il.2009.17.12.
- GOTTI, M., *Linguistic Features of Legal Texts: Translation Issues*, in *Statute Law Review*, 37(2), 2016, pp. 144–155.
- GRAZIADEI, M., *Legal Translation and the Quest for Authenticity*, in *Int J Semiot Law* 38, 2025, pp. 2565–2593, DOI: <https://doi.org/10.1007/s11196-025-10283-y>.
- HEIS, C., SOFFRITTI, M. *DeepL Traduttore e didattica della traduzione dall'italiano in tedesco. Alcune valutazioni preliminari*, in *InTRAlinea. Special Issue: Translation and Interpreting for Language Learners (TAIL)*, 2018, URL: <http://www.intralinea.org/specials/article/2294>.
- HOUSE, J., *Translation Quality Assessment, in Past and Present*, London, 2015.
- HURTADO ALBIR, A., *Traducción y traductología: Introducción a la traductología*, Madrid, 2001.
- HUSA, J., *Legal Culture vs. Legal Tradition – Different Epistemologies?*, in *SSRN Electronic Journal*, 2012, DOI:10.2139/ssrn.2179890.
- IVE, J. et al., *A Post-Editing Dataset in the Legal Domain: Do we underestimate Neutral Machine Translation Quality?*, in *Proceedings of the Twelfth Language Resources and Evaluation Conference*, 2020, pp. 3692–3697.
- KATAN, D., *Translating Cultures*, London, 2004.
- KILLMAN, J., *Machine translation and legal terminology: Data-driven approaches to contextual accuracy*, in *Handbook of Terminology*, vol. 3. Legal Terminology, Łucja Biel and Hendrik J. Kockaert (eds.), 2023, pp. 485–510, DOI: <https://doi.org/10.1075/hot.3.mac2>.
- KILLMAN, J., *Vocabulary accuracy of statistical machine translation in the legal context*, in S. O'BRIEN, M. SIMARD, L. SPECIA (eds.), *Proceedings of the 11th Conference of the Association for Machine Translation in the Americas*, Vancouver, 2014, pp. 85–98.
- KOEHN, P., KNOWLES, R., *Neural machine translation and the evaluation of its output*, in *Machine Translation*, vol. 31, no. 1–2, 2017, pp. 3–13.
- KOPONEN, M., *Is machine translation post-editing worth the effort? A survey of research into post-editing and effort*, in *The Journal of Specialised Translation*, vol. 25, pp. 131–148, 2016.



KUSIK, P., *Comparative Law in the Eyes of Translation Scholars. Is Legal Translation Really an Exercise of Comparative Law?*, in *HERMES Journal Language and Communication in Business*, 2024, p. 111-124, DOI: 10.7146/hjlc.vi64.147304.

LEIVA ROJO, J., *Aspects of human translation: the current situation and an emerging trend*, in *Hermēneus Revista de traducción e interpretación*, vol. 20, 2018, pp. 257-294.

LUO, M., *Law, Culture and Language: Challenges in Legal Term Translation from the Perspective of Comparative Legal Culture*, in *English Language Teaching and Linguistics Studies*, 6(6), 2024, DOI: [10.22158/eltls.v6n6p14](https://doi.org/10.22158/eltls.v6n6p14).

NEWMARK, P., *A Textbook of Translation*, London, 1988.

NIDA, E., *Toward a Science of Translating: With Special Reference to Principles and Procedures Involved in Bible Translating*, Leiden, 1964.

NORD, C., *Translating as a Purposeful Activity*, London, 1997.

PEÑA, E.D., *Lost in Translation: Methodological Considerations in Cross-Cultural Research*, in *Child Development*, 78 (4), 2007, pp. 1255-1264, DOI: 10.1111/j.1467-8624.2007.01064.x.

PISZCZ, A., SIEROCKA, H., *The Role of Culture in Legal Languages, Legal Interpretation and Legal Translation*, in *Int J Semiot Law* 33, 2020, pp. 533–542, DOI: <https://doi.org/10.1007/s11196-020-09760-3>.

PRIETO RAMOS, F., *Revisiting translator competence in the age of artificial intelligence: the case of legal and institutional translation*, in *The Interpreter and Translator Trainer* 18(1), 2024, pp. 148-173.

PYM, A., *Redefining Translation Competence in an Electronic Age*, in *Meta*, 48(4), 2003, pp. 481–497.

ROTARU, M.C., *Handling English culture-bound terms in Legal Translation: a compare-and-contrast approach*, in *Buletinul Științific al Universității Tehnice de Construcții București Seria: Limbi Străine și Comunicare* 12 (2), 2019, p. 63-74.

ŠARČEVIĆ, S., *New Approach to Legal Translation*, London, 1997.

SNELL HORNBY, M., *Translation studies: an integrated approach*, in Susan Bassnett & André Lefevere (eds.), *Translation, History and Culture*, London: Pinter, pp. 307-324.

UNGUREAN-MITROI, D., *Legal Translation Landscapes: The Unique Case of Romania(n) and English Pair of Languages*, in *Studii de Știință și Cultură*, vol. 1, no. 91, pp. 91-98, 2024.

VIEIRA, L.N., O'HAGAN, M., O'SULLIVAN, C., *Understanding the societal impacts of machine translation: A critical review of the literature on medical and legal use cases*, in *Information, Communication & Society*, in *Information, Communication & Society*, 24(11), 2018, 1515–1532.

VINAY J.P., DARBELNET J., *Comparative Stylistics of French and English*, Amsterdam, 1995.

WIESMANN, E., *Machine Translation in the Field of Law: A Study of Italian–German Legal Texts*, in *Comparative Legilinguistics International Journal for Legal Communication*, 37, 2019, pp. 117–153, DOI: <https://doi.org/10.14746/cl.2019.37.4>.

WILLIAMS, M., *Translation Quality Assessment*, in *Mutatis Mutandis*, vol. 2, no. 1, 2009, pp. 3–23.

WILSON, P.E., *Comparative law outside the ivory tower: an interdisciplinary perspective*, in *Legal Studies* 43 (4), 2023, pp. 641-657, DOI: 10.1017/lst.2023.6.

XU, D., *Self-regulation as a stronger predictor than motivation of translation competence*, in *Front. Psychol.* vol. 16, 2025.