

EBA ‘in house’ writing style guide

This **EBA ‘in house’ writing style guide** provides drafting and editing guidance to policy experts and all EBA staff in general, aiming to ensure consistency in the presentation of all EBA publications (irrespective of their nature and/or provenance). This shall ensure that papers are drafted in a consistent manner, as well as ensuring an easier quality control of the respective documents.

Whilst language correction for the legal text in EBA regulatory products shall be provided by Legal, during their legal quality checks, the primary responsibility for the policy package resides with the policy expert and each Department/Unit, which includes the quality of the language for the communication package.

The EU’s Centre de Traduction (CdT) should be used for enhancements to the language quality of the publication and /or translation of the policy and communication package. Contacts with the CdT shall be co-ordinated by the Press and Communications team, upon request of policy experts to initiate translation and/or language correction.

1.1 Generic style guide and templates for EBA documents

As far as possible, one editor should work on a whole document to ensure consistency of approach. If this is not possible, then the separate editors should refer to each other to provide a coherent end product.

Please familiarise yourself with specific writing conventions in the *Interinstitutional Style Guide* (Part 4, *House rules for the preparation of the text*: <http://publications.europa.eu/code/en/en-4100000.htm>) which should answer most queries, in particular:

- Adding hard spaces before numbers using Ctrl+Alt+space (e.g. Tier 1, Basel III, Level 1 text, Article 105(4)) as well as in dates
- Changing double to single quotation marks
- Laying out dates and currencies as per the Style Guide (Section 10.5 in particular):
<http://publications.europa.eu/code/en/en-4100500en.htm>
- No space before a % sign in EN texts.
- Directives and regulations relating to the EU financial field and other useful links can be found via the CdT's freelance website on the One Stop Shop for the EBA under:
EBA\02 rules and regulations\05 others\
and under this link:
http://ec.europa.eu/internal_market/bank/regcapital/legislation_in_force_en.htm

1.2 EBA editing conventions

The following list of EBA editing conventions have been integrated with suggestions raised by the CDT during editing jobs for the EBA.

- As regards any remaining stylistic issues, **British English** (BrEng) shall be preferred over the use of American English (AmEng).

In addition, the following conventions shall apply:

- RTS and ITS – these are in the **plural**
- 'procyclicality', not 'pro-cyclicality'
- 'destabilising', not 'de-stabilising'

- 'macroprudential', not 'macro-prudential'.
- 'publically' corrected into 'publicly'
- 'EBA' corrected into '**the EBA**'
- Use of '...' (BrEng) rather than "... " (AmEng)
- **Use of 's' rather than 'z'** e.g. securitisation, finalisation etc
- Formatting of the text: must always be justified
- Use of apostrophe: according to BrEng rules.
- It is very important to refer to the regulation/s mentioned where there are any article references in the text (e.g. Regulation (EU) No 575/2013 (Capital Requirements Regulation – CRR). **Do not amend wording without checking whether it is a direct citation from legislation.**
- Capital Requirements Regulation (henceforth CRR) – please remove 'henceforth' or 'so-called' (*Some EBA documents use inverted commas for these definitions and some don't. Our preference is not to have inverted commas as shown here but please follow a consistent approach if there are discrepancies within one document.*)
- The wording 'according to Article xxx' should be changed to 'in accordance with Article xxx' (or, depending on context, it could also be 'pursuant to' or 'under Article xxx').
- The term 'risk-weighted' is used with hyphen before or after noun (e.g. risk-weighted exposure amounts).
- Note the hyphenation 'year-end profits' but 'profits at the year end' and off-balance-sheet and on-balance-sheet.

Capitals:

- As a general rule, please follow conventions in the Style Guide <http://publications.europa.eu/code/en/en-4100400en.htm> see in particular Section 10.4. paragraph (j):

'References to EU legislation: write Regulation, Decision, Directive, Annex and Article (followed by a number) with capitals if they refer to specific acts; use lower case for references to regulations, directives, etc. in a generalised sense and when referring to proposed legislation (i.e. draft regulation, a possible new directive on ...).'

- This approach should also be used for 'EBA Guidelines', 'EBA Opinions'.

- If originals from the EBA diverge from this, **work on the basis of making each document consistent within itself.**
- No need to capitalise terms such as 'draft regulatory technical standards (RTS)' in running text (*we generally found them to be in lower case in EU docs*).
- Some terms (e.g. 'Standardised Approach' / 'IRB Approach') are in upper case in the CRR; nonetheless, lower case is also often found in EBA documents. If a document is citing legislation please check the specific reference and follow that format.
- The word 'Article' is capitalised if followed by a specific reference from legislation. **New instruction from client with EBA_2013_0082, retain the wording 'Article (x) of the CRR'.**
- The format of titles which the CdT proposes is not to use initial capitals but only a capital for the first word of the title (however, this has not been always applied consistently internally).
- 'Consultation Paper' retains its initial capitals.

Acronyms/Abbreviations

- If there is a glossary at the beginning of a document with definitions and abbreviations, or if the abbreviations are defined in the executive summary, there is no need to define them again in the text and the abbreviations can be used in the running text of the document.
- If there is no glossary, write out in full commonly-occurring terms when they first appear with an abbreviation in brackets to be used thereafter (examples from other EBA documents: Common Equity Tier 1 (CET1), National Supervisory Authority (NSA) (but 'national supervisors')).
- Please also check via Google searches any abbreviations which seem unclear. It may be that they are common financial abbreviations which will be clear to the target audience but you might recommend in a comment that they are defined at first mention.
- Please remove 'EC' for European Commission and write 'the Commission' instead.
- The correct format for the CRD IV package is 'CRD IV'; please add a hard space to 'CRDIV'.

Further editing suggestions in EBA documents

- In the first section of Consultation Papers ('1. Responding to this consultation') the wording is more or less standard and need not be changed except for adding hard spaces

in dates and between the references to Regulation (EC) No 45/2001. Note that in EN, the abbreviation 'No' does not have a superscript letter 'o'.

- Consultation papers usually have a section entitled 'Draft cost-benefit analysis / impact assessment'. The wording often suggests that the EBA Regulation requires the EBA to produce an 'Impact Assessment (IA)'. This wording is not actually in the EBA Regulation and the term 'Impact Assessment' does not appear so we have a suggested wording for this section. **Please note that this is different depending on whether the EBA's document is regulatory technical standards (as per Article 10(1) of the EBA Regulation), implementing technical standards (Article 15(1)) or guidelines and recommendations (Article 16(2)).** Please refer to the text of your document and word accordingly:

Examples:

'5.1 Draft cost-benefit analysis / impact assessment

Article 10(1) of the EBA Regulation provides that when any regulatory technical standards developed by the EBA are submitted to the Commission for adoption, they should be accompanied by an analysis of 'the potential related costs and benefits'. This analysis should provide an overview of the findings regarding the problem to be dealt with, the solutions proposed and the potential impact of these options.'

OR:

'Article 15(1) of the EBA Regulation provides that when any draft implementing technical standards developed by the EBA are submitted to the Commission for adoption, they should be accompanied by an analysis of 'the potential related costs and benefits'. This analysis should provide an overview of the findings regarding the problem to be dealt with, the solutions proposed and the potential impact of these options.'

OR:

'Article 16(2) of the EBA Regulation provides that the EBA should carry out an analysis of 'the potential related costs and benefits' of any guidelines it develops. This analysis should provide an overview of the findings regarding the problem to be dealt with, the solutions proposed and the potential impact of these options.'

For reference, please see the relevant articles of the EBA Regulation in:

<http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32010R1093&from=EN>

1.3 Additional references

In addition to the editing conventions detailed above, here you can find useful links to useful websites or publications that you might find useful while drafting your documents:

- **How to write clearly**, a EC guide for drafting clear documents, whatever the type — legislation, a technical report, minutes, a press release or speech:
http://ec.europa.eu/translation/writing/clear_writing/how_to_write_clearly_en.pdf
- **Writing for translation**, a CdT booklet intended for writers of EU texts in English for translation, including tips on how to structure your texts to make them concise, unambiguous and easy to read:
http://cdt.europa.eu/CDT%20Publication%20Book/Writing%20for%20translation/WRITING_FOR_TRANSLATION_EN.pdf
- **MISUSED ENGLISH WORDS AND EXPRESSIONS IN EU PUBLICATIONS**
http://ec.europa.eu/translation/english/guidelines/documents/misused_english_terminology_eu_publications_en.pdf
- Joint Practical Guide on drafting legislation (Parliament, Council and Commission):
<http://bookshop.europa.eu/en/joint-practical-guide-of-the-european-parliament-the-council-and-the-commission-for-persons-involved-in-the-drafting-of-legislation-within-the-community-institutions-pbKA4502094/>
- Plain English Campaign: <http://www.plainenglish.co.uk/>
- Plain Language Commission: <http://www.clearest.co.uk/>
- Clarity – an international association promoting plain legal language: <http://www.clarity-international.net/>
- Plain Language Association International: <http://www.plainlanguagenetwork.org/>
- Center for Plain Language: <http://centerforplainlanguage.org/>
or <http://centerforplainlanguage.org/5-steps-to-plain-language/>
- US government plain language website: <http://www.plainlanguage.gov/>