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UPDATED FINANCIAL ANALYSIS OF THE POSSIBLE INTRODUCTION OF NEW LANGUAGES

Document prepared by the International Bureau

BACKGROUND

1. At its fourteenth session, held from October 6 to 8, 2025, the Working Group on the Legal Development of the Hague System for the International Registration of Industrial Designs (hereinafter referred to as the "Working Group"), discussed the possible introduction of new languages to the Hague System[1].

2. The Working Group requested the International Bureau to prepare, for its following session, documents providing:

(i) possible options for reducing the cost in translation while maintaining quality, as well as optimizing translation practice, including for the possible introduction of new languages, and updating the study in document H/LD/WG/11/4, taking into account newly available and applicable AI machine translation tools and technologies; and

(ii) an updated financial analysis of the possible introduction of new languages, including, but not limited to, the reduction of costs under a differentiated translation practice, and an assessment of outsourced translation costs based on different options and practices[2].

[1] See document H/LD/WG/14/1 Prov.2 (Draft Agenda).
[2] See document H/LD/WG/14/10 Rev. (Summary by the Chair).

3. The International Bureau has prepared two documents to fulfil the requests made by the Working Group, namely document H/LD/WG/15/6, entitled "Possible Options for Reducing Translation Costs While Maintaining Quality" and the present document, which contains an update of document H/LD/WG/14/8 entitled "Updated Financial Analysis of the Introduction of New Languages". This document is divided into three sections: general considerations, description of the request for information (RFI) process, and an updated financial analysis.

GENERAL CONSIDERATIONS

4. This updated financial analysis has been carried out based on the following considerations:

Translation Cost Estimates are based on an RFI process

5. The financial analysis of recurring translation costs in document H/LD/WG/14/8 was based on rates from external translation companies applicable in 2025 for the translation of documents under the Patent Cooperation Treaty (PCT)[3]. In order to fulfil the Working Group's request for an updated financial analysis, the International Bureau conducted an RFI process in April 2026, with a view to gathering cost estimates from external translation service providers specifically for design-related documents. The updated financial analysis of all translation costs contained in this document is based on the cost estimates obtained in the RFI process.

Translation estimates are based on the translation rates of specific language combinations

6. Translation rates vary depending on the language combination. Accordingly, an RFI process must be conducted for specific language combinations to obtain meaningful cost estimates from translation service providers. The RFI process conducted by the International Bureau covered language pairs for seven languages: Arabic, Chinese, German, Japanese, Korean, Portuguese and Russian. These seven languages, along with English, French and Spanish, constitute the publication languages under the PCT. Collectively, they also encompass the official languages of the United Nations, the languages under discussion in the context of the Madrid System, and those proposed for inclusion as filing or working languages in the Hague System.

RFI PROCESS

7. The International Bureau invited 32 translation service providers registered in the United Nations Global Marketplace to participate in the RFI process[4]. Providers were asked for information on their knowledge and experience of translating design-related indications, the technology that they use, their data-security measures and their translation capacity. They were also asked to provide non-binding quotes for both translation with subsequent revision and post-editing with subsequent revision. Translation occurs when a service provider translates text directly from the source language to the target language. Post-editing occurs when a service provider reviews machine translated output to confirm its accuracy and makes necessary edits. Revision is a manual review of either direct translation or post-editing output, performed before delivery by a senior translator working for the service provider. Revision ensures the highest quality service.

8. Non-binding quotes are expressed as possible ranges of fees per translated or post-edited word in Swiss francs, with service providers indicating both their lowest and highest possible rates. In providing non-binding quotes as ranges, translation service providers

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[3] See document H/LD/WG/14/8, paragraph 24.

[4] During an RFI process, potential service providers are invited to indicate a non-binding range of quotes for a given service in a confidential manner. They are given detailed information on the required service. In addition to the quotes, service providers must deliver other relevant information concerning, for example, their experience and capacity.

deliberately indicated wide spans in order to exercise caution in the face of numerous unknowns. Without specific project details, providers must account for potential variations in text complexity, technical terminology, formatting requirements and turnaround time, all of which may affect pricing.

9. In some cases, non-binding quotes for post-editing services are not substantially lower than those for direct translation, primarily owing to uncertainty regarding the quality of the machine translation output. Service providers must hedge against the possibility that extensive revision, essentially approaching full retranslation in some cases, might be required if the machine translation proves inadequate.

10. During an actual tender process, this uncertainty would be greatly reduced, as companies would receive representative samples of the data with which they would be working, something that is not possible during the RFI process. This allows providers to evaluate the quality of the machine translation firsthand, assess the actual level of post-editing required and consequently refine their estimates to provide definitive quotes, which would normally fall within the range indicated during the RFI process.

11. In addition, price is neither the only nor necessarily the main factor in selecting a service provider. Translation service providers are required to produce samples of their work, which are thoroughly assessed for quality. Other factors weigh significantly in the selection process, including demonstrated experience in translating design-related indications, the number of qualified staff available and technological expertise in specialized translation tools. Furthermore, contracts are frequently allocated to several service providers simultaneously, with their work constantly reviewed for quality assurance. Additional work assignments depend on providers maintaining output of the highest possible quality.

12. In view of the foregoing, at this stage, the most prudent approach to determining the overall possible range is to consider all non-binding quotes and select the lowest and highest values. While this approach results in a wide range, it encompasses all possible scenarios should an actual tender process be conducted.

13. There are several potential pitfalls when using alternative methods to determine the most likely price range. Selecting a narrower range by excluding outliers or averaging estimates might create an artificially constrained estimate that fails to accommodate actual market conditions during the formal tender process. Service providers may quote differently when submitting binding offers, in particular if project specifications change or market conditions shift between the initial inquiry and the formal tender. Additionally, focusing only on median values could exclude legitimate cost scenarios that might emerge owing to varying quality requirements, urgent factors or specialized terminology needs. By restricting the range prematurely, there is a risk of either overestimating the budgetary needs or, more problematically, assigning insufficient funds when actual bids arrive.

14. Ten translation service providers participated in the RFI process and provided quotes for translation and post-editing services for different language pairs. The rates indicated in those quotes form the basis of the set-up and recurring translation cost estimates presented in this document.

UPDATED FINANCIAL ANALYSIS

15. Like the previous analysis in document H/LD/WG/14/8, this updated financial analysis includes both set-up and recurring costs that would occur if a new language were introduced in the Hague System.

SET-UP COSTS

16. As outlined in document H/LD/WG/14/8, the introduction of a new language would require modifications to the existing Information and Communications Technology (ICT) system and the translation of relevant materials.

ICT system

Filing Language Option

17. This option would require changes to the current ICT system to enable applicants to file international applications in a new language. The estimated costs for system developments remain unchanged, at approximately 200,000 Swiss francs per new language[5].

Working Language Option

18. This option would require changes to the current ICT system to enable applicants and holders to perform all online transactions in a new language. Additionally, internal system updates would be required to enable the International Bureau to examine international applications, communicate with applicants, holders and Offices of designated Contracting Parties, and record and publish all information concerning international registrations in the new language. The estimated costs for the changes to the current ICT system remain unchanged, at approximately 300,000 Swiss francs per new language[6].

Translation of Relevant Materials

Filing Language Option

19. The introduction of a new language as a filing language would require translation of the eHague filing interface, form DM/1 and all information materials[7].

20. Based on the indicated rates during the RFI process, it is estimated that the translation costs of the relevant materials for the filing language option would range from 9,000 to 51,000 Swiss francs for the language combination with the lowest rates and from 26,000 to 83,200 Swiss francs for the language combination with the highest rates.

21. Alternatively, translations could be produced using machine translation technologies, including large language models. The output would require post-editing to varying degrees, depending on the output quality for each language combination. Post-editing costs for the filing language option are estimated to range from 7,800 to 41,600 Swiss francs for the language combination with the lowest rates, and from 20,000 to 68,400 Swiss francs for the language combination with the highest rates[8].

22. Table I below shows the estimated range of rates for the translation and post-editing of the relevant material.

Table I: Range of Possible Costs for the Filing Language Option in Swiss Francs (CHF)

	Translation with revision	**Post-editing of machine translation output with revision**
Language pair with lowest rates	Between 9,000 and 51,000	Between 7,800 and 41,600
Language pair with highest rates	Between 26,000 and 83,200	Between 20,000 and 68,400

5 See document H/LD/WG/14/8, paragraph 9.
6 See document H/LD/WG/14/8, paragraph 10.
7 However, the Hague legal texts, the Hague Guide for Users, the Guidance on Reproductions, the Guidance on Multiple Designs and the Accession Kit already exist in all six UN languages. See document H/LD/WG/10/4, Annex I.
8 These costs could be further reduced for certain language combinations for which in-house translation services are available, subject to the workload and internal resources of those services.

Working Language Option

23. The introduction of a new language as a working language would require translation of all resources, including eHague interfaces, forms, database interfaces, the *International Designs Bulletin*, and all notification templates[9].

24. Based on the indicated rates during the RFI process, it is estimated that the translation costs would range from 11,250 to 63,750 Swiss francs for the language combination with the lowest rates and from 32,500 to 104,000 Swiss francs for the language combination with the highest rates.

25. It is estimated that the post-editing costs would range from 9,750 to 52,000 Swiss francs for the language combination with the lowest rates and from 25,000 to 85,500 Swiss francs for the language combination with the highest rates[10].

26. Table II below shows the estimated range of rates for the translation and post-editing of the relevant material.

Table II: Range of Possible Costs for the Working Language Option in Swiss Francs (CHF)

	Translation with revision	**Post-editing of machine translation output with revision**
Language pair with lowest rates	Between 11,250 and 63,750	Between 9,750 and 52,000
Language pair with highest rates	Between 32,500 and 104,000	Between 25,000 and 85,500

RECURRING COSTS

ICT System

27. The estimated annual costs for the maintenance of the ICT system and online resources remain unchanged, amounting to approximately 100,000 Swiss francs per language under both the filing language and working language options[11].

Translation

Filing Language Option

28. Under this option, applicants would be able to file international applications in a new language, in addition to the current three languages. The International Bureau would translate text contained in international applications into English as the "relay language", and then from English into French and Spanish[12].

29. The methodology followed in this updated analysis for calculating recurring translation costs under this option differs from that used in document H/LD/WG/14/8. The previous analysis estimated additional translation costs based on the average word count per design in international applications, without considering the number of international applications filed in a specific language. This language-neutral approach produced a generic cost table applicable to any new language, regardless of any specific language combination[13].

9 See footnote 7, above.
10 See paragraph 21, above.
11 See document H/LD/WG/14/8, paragraph 20.
12 For further information on the introduction of "indirect translation" with English as the relay language, see document H/LD/WG/8/5, paragraphs 24 to 29.
13 See document H/LD/WG/14/8, paragraphs 22 to 26, and Table I.

30. This analysis continues to use the same baseline, namely the average word count per design in international applications[14]. However, this analysis is based on the rates indicated by the potential service providers during the RFI process. In addition, the calculations factor in the actual number of designs in international applications filed in 2025, categorized by the language used in the applicant's Contracting Party[15].

31. Moreover, this updated analysis does not contain projections based on forecasts of future filing activity under the Hague system. The estimated costs presented therefore represent what the additional translation expenditure would have been in 2025 had the new languages been available in the Hague System during that year.

32. The Table in the Annex shows the estimated range of costs for translation into English, based on the rates indicated by the potential service providers.

33. The International Bureau does not have any translation memories for new languages. However, it should be able to benefit gradually from the compilation of translation data, which would reduce the volume of translations that need to be outsourced. It is estimated that approximately 2.5 per cent of words per language could initially be matched automatically through the translation memories, with this share expected to increase by around 2.5 per cent per year (up to approximately 40 per cent)[16]. Once the machine translation output is of sufficient quality, the outsourcing costs would be based on post-editing rates instead of translation rates. Based on the information provided by translation providers during the RFI process, it is estimated that the use of post-editing services instead of translation services could decrease translation costs by around 20 per cent.

Working Language Option

34. Under this option, the language regime envisaged in Rule 6 of the Regulations under the Geneva Act (1999) of the Hague Agreement Concerning the International Registration of Industrial Designs (Regulations) would also apply to a new language. Applicants would be able to file international applications in any new language and the International Bureau would record and publish international registrations in any new language, in addition to English, French and Spanish.

35. For any new languages, the International Bureau would translate text using English as the "relay language"[17]. Compared to the current translation workload, the additional translation work would therefore consist of translating text either from a new language into English or from English into a new language.

36. As with the filing language option, the additional translation costs would depend on the total number of words contained in international applications per calendar year and the applicable fees per word. However, unlike the filing language option, where text is only translated from a new language into English, the working language option requires translation in both directions – from a new language into English and from English into a new language.

37. The Table in the Annex provides an estimated range of translation costs for various possible new languages, calculated on the basis of: (i) the actual number of designs contained in international applications filed in 2025 by applicants from Contracting Parties, categorized by the language used in the jurisdiction of the applicant[18], (ii) the total number of designs contained in international applications in 2025[19], (iii) the average number of words per design[20], and

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[14] In 2025, an international application contained an average of 24.5 words per design.
[15] The analysis is based on updated statistics of Table II in document H/LD/WG/14/6 Rev.
[16] See documents H/LD/WG/10/4, paragraph 24 and H/LD/WG/11/4, paragraph 13. A thorough assessment of the projected increase in matching rates could only be carried out after the first full year of implementation.
[17] See paragraph 28, above.
[18] See paragraph 30, above.
[19] In 2025, 28,588 designs were contained in international applications (see *Hague Yearly Review 2026*). This is relevant as the International Bureau would have to translate all international applications that are not filed in a new language into this language.
[20] See footnote 14, above.

(iv) the range of rates indicated by the potential service providers during the RFI process for translations from a new language into English and from English into a new language.

38. In sum, if the Hague System had operated with an additional working language in 2025, the estimated additional annual translation costs would have been between 34,271 and 288,483 Swiss francs, depending on the language and the service provider (based on the assumption that all text in international applications would have had to be translated either from a new language into English or *vice versa*)[21].

Quality Control

39. A percentage of the outsourced translation work would be subject to quality control by a senior internal translator who is proficient in the source language and whose mother tongue is the target language[22]. The introduction of a new language as a filing language would therefore require a translator whose mother tongue is English and who is proficient in the new language. The introduction of a new language as a working language would additionally require a translator whose mother tongue is the new language and who is proficient in English.

40. It is estimated that the total cost for quality control for any new language would not have exceeded 2,768 Swiss francs for the filing language option and 12,633 Swiss francs for the working language option in 2025[23].

Differentiated Translation Practice

41. One possible option to reduce potential additional translation costs would be to apply a differentiated translation practice[24]. Under such a practice, the International Bureau would provide translations using existing translation memories and WIPO Translate, without undertaking post-editing and quality control of the machine translation output obtained through WIPO Translate for languages that are not communication languages of designated Contracting Parties[25].

42. For example, if Chinese were a working language of the Hague System, under the current translation practice, all international applications filed in Chinese would be translated into English, and then from English into all the other working languages of the Hague System, with post-editing and quality control, irrespective of the Contracting Parties designated in those international applications. Under a differentiated translation practice, international applications filed in Chinese would be translated into English, with post-editing and quality control of the machine translation output obtained through WIPO Translate. However, translations from English into the other working languages would only be subject to post-editing and quality control if those languages serve as the language of communication by the Office of a designated Contracting Party. Conversely, for applications filed in other working languages, the International Bureau would only undertake post-editing and quality control of the machine translation output from English into Chinese if China is a designated Contracting Party.

43. The International Bureau conducted a further analysis of the impact of the possible introduction of a differentiated translation practice on the translation workload, based on the number of filings and designations therein in 2025. This analysis is based on the assumption that translations are carried out using an indirect translation practice with English as the "relay language".

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21 See also paragraph 30, above.

22 It is generally considered sufficient to subject seven per cent of outsourced translation work to quality control by a senior translator. For further details on the quality control methodology, see Annex II to document H/LD/WG/10/4, paragraph 26.

23 See Table in the Annex.

24 For more information, see document H/LD/WG/14/7, paragraph 7.

25 Pursuant to Rule 6(3)(ii) of the Regulations, the International Bureau communicates with the Offices of Contracting Parties either in the language notified by an Office as communication language, or in the language of the international application.

44. Based on the analysis carried out, it is estimated that a differentiated translation practice could potentially reduce the additional translation workload by up to 80 per cent for a new working language of a Contracting Party.

45. A differentiated translation practice would not reduce the additional translation workload under the filing language option because all international applications filed in a new language would be translated into English, irrespective of the designated Contracting Parties.

Examination

46. The costs for the examination of international applications have been updated with the standard costs for personnel for 2026[26].

Filing Language Option

47. As outlined in document H/LD/WG/14/8, the introduction of a new language under this option would not affect the examination costs[27].

Working Language Option

48. Under this option, the International Bureau would require examiners proficient in that language[28]. It is estimated that a new language with fewer than 1,000 filings could involve annual expenditure of between 90,000 Swiss francs and 154,300 Swiss francs. For a new language with more than 1,000 filings, the annual expenditure could be of between approximately 180,000 Swiss francs and 309,000 Swiss francs[29].

Customer Support and Relations

49. The costs for customer support, outreach and promotion have been updated with the standard costs for personnel for 2026[30]. It is estimated that providing customer support in a new language with fewer than 500 filings could entail an annual expenditure of between approximately 45,000 Swiss francs and 77,000 Swiss francs[31]. For a new language with fewer than 1,000 filings, the annual expenditure could be of between 90,000 Swiss francs and 154,300 Swiss francs[32]. For a new language with more than 1,000 filings, it is estimated that the annual expenditure could be of between approximately 180,000 Swiss francs and 309,000 Swiss francs[33].

50. The above figures are based on conventional staffing models. However, use of AI-assisted support tools has the potential to reduce some of these costs.

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[26] In 2026, the annual standard cost of G6-level personnel is approximately 154,300 Swiss francs, while that of an ICS contractor is approximately 90,000 Swiss francs.

[27] Under this option, the International Bureau would translate international applications filed in new languages into English for examination. The International Bureau would therefore not require examiners proficient in any new languages.

[28] The International Bureau would examine international applications, communicate with applicants, holders and offices of designated Contracting Parties, and record and publish all information concerning international registrations in a new language. At present, the Hague Registry has the minimum possible resources to examine international applications in some new languages (see document H/LD/WG/10/4, paragraph 33).

[29] In general, for a new language with more than 1,000 international applications per year, two full-time examiners would be required. For a new language with fewer than 1,000 international applications per year, two part-time examiners would be required at 50 per cent capacity.

[30] See footnote 26, above.

[31] For a new language with fewer than 500 international applications per year, the International Bureau could provide customer service with one customer support agent and the assistance of machine translation.

[32] For a new language with fewer than 1,000 international applications per year, two customer support agents proficient in the new language would be required at 50 per cent capacity.

[33] For a new language with more than 1,000 international applications per year, two customer support agents proficient in that language would be required for back-up. The costs could potentially be reduced if the International Bureau can recruit multilingual customer support agents.

Summary

Set-Up Costs

Filing Language Option

– The total approximate set-up costs for the development of the ICT system and the translation of all materials would be between 207,800[34] and 283,200[35] Swiss francs per new language.

Working Language Option

– The total approximate set-up costs for the development of the ICT system and the translation of all materials would be between 309,750[36] and 404,000[37] Swiss francs per new language.

Recurring costs

Filing Language Option

– The total recurring annual costs for the maintenance of the ICT system would remain at approximately 100,000 Swiss francs per language[38].

– Annual translation and quality control costs for a new filing language would have ranged from approximately 95 to 43,614 Swiss francs in 2025, depending on the language and service provider[39].

– These costs would be expected to decrease over time as translation memories for new languages develop[40].

– Under this option, there would be no additional costs for the examination of international applications[41].

– Based on 2026 data, it is estimated that the recurring annual costs for customer support, outreach and promotion would be between approximately 45,000 and 309,000 Swiss francs, depending on the language[42].

Working Language Option

- The total recurring annual costs for the maintenance of the ICT system would remain at approximately 100,000 Swiss francs per language[43].

- Annual costs for translation and quality control for a new working language would have been between approximately 44,302 and 300,747 Swiss francs in 2025, depending on the language and the service provider[44].

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[34] 200,000 Swiss francs for modifications to the ICT system and 7,800 Swiss francs for the post-editing of relevant material.
[35] 200,000 Swiss francs for modifications to the ICT system and 83,200 Swiss francs for the translation of relevant material.
[36] 300,000 Swiss francs for modifications to the ICT system and 9,750 Swiss francs for the post-editing of relevant material.
[37] 300,000 Swiss francs for modifications to the ICT system and 104,000 Swiss francs for the translation of relevant material.
[38] See paragraph 27, above.
[39] See Table in the Annex.
[40] See paragraph 33, above.
[41] See paragraph 47, above.
[42] See paragraph 49, above. The exact costs would depend on the number of international applications filed in a new language, which would determine the necessary human resources.
[43] See paragraph 27, above.
[44] See Table in the Annex.

- These costs would be expected to decrease over time with the development of translation memories for new languages and the use of a differentiated translation practice[45].

- Based on 2026 data, it is estimated that the recurring annual costs for examination, customer support, outreach and promotion could be between approximately 135,000 and 618,000 Swiss francs per language, depending on the language[46].

51. *The Working Group is invited to:*

(i) consider the contents of this document; and

(ii) provide further instructions to the International Bureau.

[Annex follows]

[45] See paragraphs 33 and 41, above.

[46] See paragraphs 48 and 49, above. The lower figure of 135,000 Swiss francs comprises 90,000 Swiss francs for examination and 45,000 Swiss francs for customer support, outreach and promotion; the higher figure of 618,000 Swiss francs comprises 309,000 Swiss francs for examination and 309,000 Swiss francs for customer support, outreach and promotion.

Table: Range of Possible Translation Costs in 2025 in Swiss Francs (CHF)

	Filing Language Option		**Working Language Option**	
	From	To	From	To
Possible range, per word, (extremes)[47]	0.064	0.291	0.045	0.416
Translation cost estimate into English[48]	81	40,998	81	40,998
Translation cost estimate from English	n/a	n/a	25,000	282,543
Total cost of translation from and into English[49]	81	40,998	34,271	288,483
Internal quality control	14	2,768	9,879	12,633
Total estimate (including quality control)[50]	95	43,614	44,302	300,747

[End of Annex and of document]

[47] These figures represent the lowest and highest per-word rates, in Swiss francs, indicated in the non-binding quotes provided by service providers during the RFI process.
[48] These cost estimates are based on the quotes provided for translation per word into English.
[49] It should be noted that the figures in this row do not represent the sum of the amounts shown in the same column, as each row independently reflects the lowest and highest possible amounts across all cost components, based on the range of rates provided by service providers.
[50] The total estimate comprises the cost of translation from and into English and the cost of quality control. As with the preceding rows, the figures shown do not represent the sum of the amounts in the same column, since each row independently reflects the lowest and highest possible amounts across all cost components, based on the range of rates provided by service providers.