

Accessible public warnings under Article 11: proposed language for the draft General Comments

From International Deaf Emergency (IDE), a Deaf-led United States 501(c)(3) nonprofit, international member of the World Federation of the Deaf and member of the Reference Group on Inclusion of Persons with Disabilities in Humanitarian Action. Offered to the International Disability Alliance and the World Federation of the Deaf for their engagement with the Committee as the two Article 11 drafts are revised; this proposal is submitted by IDE and does not presume endorsement. Contact: Emmanuel Jacq, President · emmanuel.jacq@ideafe.org · ideafe.org

The protection gap

Many public warning systems use audible signals or generic vibrations that indicate an alert has arrived without independently identifying the hazard, the urgency, or the protective action. This creates particular barriers for Deaf, hard-of-hearing and DeafBlind persons, and many warnings communicate nothing actionable through a DeafBlind-accessible channel. A warning that a person cannot perceive, understand and use cannot provide that person with effective protection.

The paragraph we ask the Committee to reflect

States parties should ensure that public warning and emergency communication systems provide redundant visual, auditory and tactile attention signals, together with timely, equivalent and understandable warning content in accessible formats. Each attention channel should independently indicate that an urgent warning has been issued, and may additionally indicate the hazard category where such signals have been validated with affected users. No essential element, including the urgency or severity of the emergency, the type and location of the hazard, and the protective action required, should be conveyed solely through sound, colour or another single sensory feature. Persons who rely on touch, including DeafBlind persons, must be able to detect warnings through tactile means and access the full message through compatible assistive technologies or other appropriate tactile and DeafBlind communication methods. Warning content should be available, through the warning medium itself or through an immediately accessible and interoperable linked channel, in plain language, Easy Read, national sign languages through qualified interpreters and/or Deaf presenters, captioned formats, and formats compatible with screen readers and refreshable braille, according to users' communication requirements. States parties should develop, procure, test and monitor such systems in close consultation with and with the active involvement of representative organizations of persons with disabilities, particularly those of Deaf and DeafBlind persons.

The structure is deliberate: DETECTION is redundant across the senses; the FULL WARNING, including the action, is guaranteed in accessible language.

The Convention basis

Article 11 obliges States to take all necessary measures to ensure the protection and safety of persons with disabilities in situations of risk, read together with Article 2 (communication includes accessible modes, means and formats), Article 4(3) (close consultation and active involvement through representative organizations), Article 5 (equality and non-discrimination), Article 9 (accessibility of information, communications and emergency services), Article 21 (access to information and recognition of sign languages) and Article 30(4) (sign languages and Deaf culture). General Comment No. 2 recognizes that emergency services must be accessible; General Comment No. 7 makes active involvement through representative organizations central.

Feasibility and precedent

- The joint WFD and WASLI statement on emergency communication (2015)¹ identifies the nature, location and severity of the emergency and the action required as essential information for Deaf people, with national sign languages central to its delivery.
- United States rules require mobile providers to support pre-scripted American Sign Language alert templates by June 12, 2028 (originator use remains optional), and the United States regulator is consulting now on hazard symbols and on making alerts attract attention more effectively; IDE is filing for equivalent visual and tactile attention signals.²
- IDE has built a working prototype on unmodified consumer phones and publishes a publicly available, royalty-free reference specification, with Apache-2.0 code and a machine-checkable conformance suite, offered as feasibility evidence, not as a required or exclusive solution.³ Hazard-differentiated tactile patterns may reduce learning burden; their design should be co-produced and validated with DeafBlind and other affected users, and IDE's structured study with Deaf and DeafBlind participants is underway (the final page illustrates).

The request

That IDA's and WFD's engagement with the Committee carry the paragraph above, or its substance, into the relevant draft General Comment on Article 11: every person can detect a warning through an accessible attention channel and obtain the full warning, including the action, in an accessible format; touch suffices for detection where touch is the only channel; and systems are built and tested with the communities they must protect.

¹ WFD and WASLI, joint statement on emergency communication for deaf sign language users (2015), wfdeaf.org.

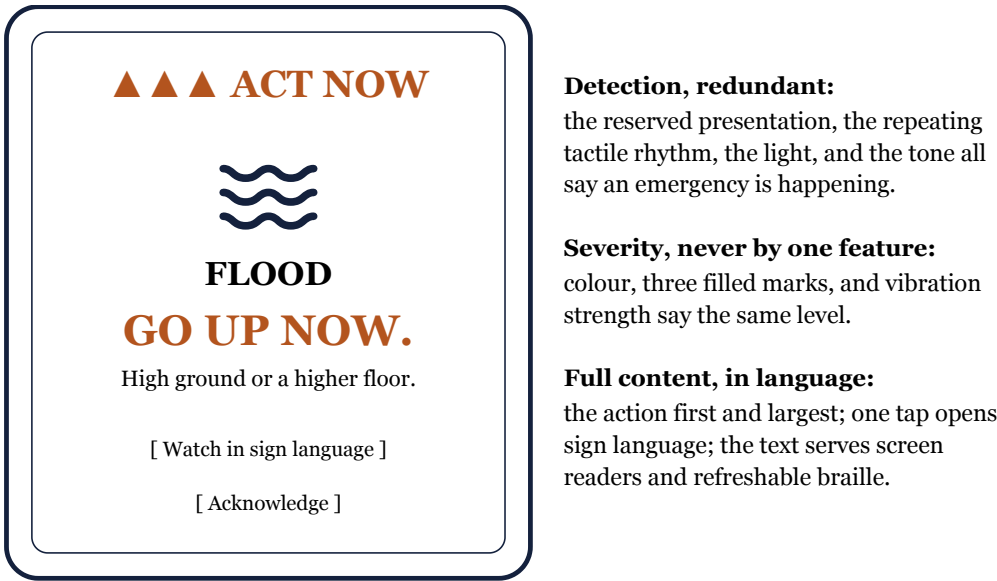
² FCC 26-38, PS Dockets 15-91, 15-94, 25-224 (symbols at paragraphs 77 to 82, earthquake alert enhancements at 83 to 86; comments due August 31, 2026); template rule: 47 C.F.R. § 10.500(e)(2), compliance June 12, 2028 (DA 25-1078).

³ github.com/Signlo/three-senses (Apache-2.0 code and vocabulary; royalty-free specification with an adaptation grant for standards bodies); DOI 10.5281/zenodo.21977982.

The framework, illustrated

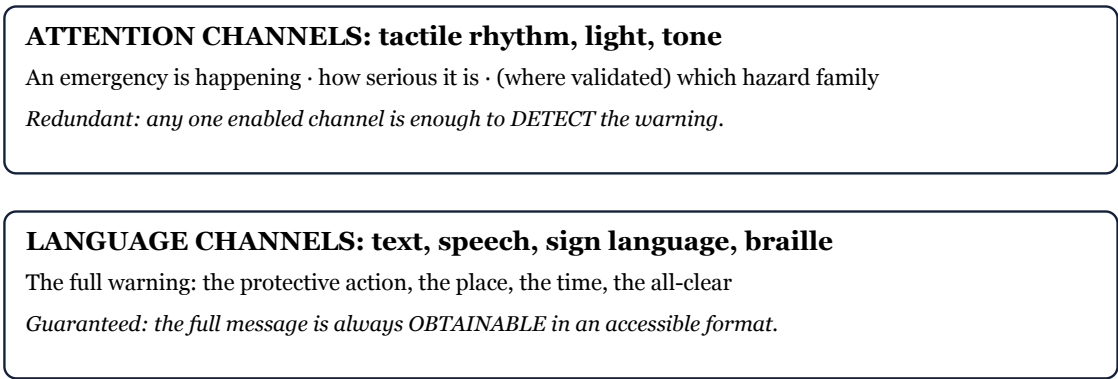
Illustrative, non-prescriptive example. The proposed obligation is technology-neutral and does not require this particular interface or vocabulary.

Figure 1. One flood alert from the reference prototype



The two-layer principle on one screen: any single attention channel suffices to detect the emergency; the full message, including the protective action, is guaranteed in accessible language. Every figure on this page is drawn still; nothing flashes.

Figure 2. Detection and understanding: which channels carry what



Detection plus accessible full content. The protective action is selected by the alert originator and conveyed in language; it is never inferred by a device from a vibration alone.

Figure 3. Severity without dependence on any single sensory feature

SAFE NOW	no marks	an affirmative all-clear message, presented calmly
BE CAREFUL	▲	gentle vibration; calm colour; one mark
DANGER COMING	▲▲	stronger vibration; two marks; light and sound at full reach
ACT NOW	▲▲▲	strongest vibration; three marks; the action stated first

Colour, a colour-independent mark count, words, and (where the device supports it) graded vibration say the same thing, so no essential element rides on one sensory feature. The absence of an alert is never presented as evidence of safety: an all-clear is an affirmative, authenticated message naming what ended.