



27<sup>th</sup> February 2026

Recreational Water Quality Advisory Council  
National Health and Medical Research Council  
GPO Box 1421  
Canberra ACT 2601

Email – [water@nhmrc.gov.au](mailto:water@nhmrc.gov.au)

Submission made via website link -  
<https://consultations.nhmrc.gov.au/environmental-health/australian-recreational-water-quality-guidelines/consultation/>

### **Submission regarding Australian Recreational Water Quality Guidelines**

Outdoors Queensland is the peak body for the outdoor sector in Queensland.

We represent outdoor organisations and individuals in Queensland, consisting of a range of outdoor industry stakeholders, covering the five broad pillars of outdoor activities:

- outdoor and environmental education,
- outdoor health (including adventure therapy),
- outdoor tourism (adventure/ nature-based tourism), and
- associated support services (e.g. land and water management, infrastructure, sector training and development, other support services, retail sales).

The mission of Outdoors Queensland is to ensure that Queensland's outdoor sector is empowered, supported and valued. Our vision that everyone can enjoy the health and well-being benefits of the outdoors through a thriving Queensland outdoor sector.

Outdoors Queensland appreciates the opportunity to contribute to this important process.

Comments on the overall approach taken to develop the draft guidance:  
We understand that the guidelines are intended to provide advice on the management of any natural or artificial water bodies which may be used for recreational and/or cultural activities where human exposure to water occurs.

We acknowledge that the Recreational Water Quality Advisory Council is a group of impressive people with detailed knowledge of the subject matter, however we suggest that it would have been worthwhile to engage directly with recreational peak body organisations in the development of the draft Guidelines, rather than simply presenting the draft Guidelines for public consultation.



As a state peak body for outdoor recreation activities, we suggest that Outdoors Queensland, similar organisations from other States, and national peak organisations such as the Outdoor Council of Australia, should have been considered key stakeholders in this process. We would have appreciated the opportunity to be involved and contribute throughout this process, rather than only in the final stages.

General/overall comments about the implementation or application of the draft Guidelines:

Outdoors Queensland suggests appropriate government funding should be allocated to an effective education campaign to ensure that all water managers, including private operators and community organisations, are aware of these guidelines and understand the implications on their operations.

Comments on the draft Chapter 2 - Preventive risk management framework:

Outdoors Queensland appreciates that preventative risk management frameworks have been adopted in the Australian Drinking Water Guidelines and Australian Guidelines for Water Recycling, and the committee is proposing to replicate that framework for recreational water quality.

Section 2.1.1 of the draft Guidelines notes that the recreational water context has a key difference in that recreational drinking water bodies are not treated. Accordingly, "controls to prevent or minimise risks to public health are predominately pollution mitigation within the catchment, modelling and monitoring, and public communications."

We suggest that rather than focussing purely on risk assessment, it would be beneficial to move towards benefit risk assessment, so that instead of merely identifying and mitigating hazards/risks, the potential hazards/risks could be measured against potential positive outcomes (benefits) and measures to enhance identified benefits. Benefit Risk Assessment is commonly used in health settings (e.g. vaccine development), and is being incorporated into the modern approach to management of outdoor activities more generally.

We note that the Administrative report lists considerations of "Health benefits vs harms" in the discussion of evidence to decision factors for guideline options, so benefits are being assessed and considered, however we suggest it could be more overtly included as part of the process - for example, Table 2.2 of the draft guidelines uses "Risk Assessment", rather than "Benefit Risk Assessment" in the instructions on how to apply the framework.

Outdoors Queensland supports the proportionate approach to water quality risk described in section 2.1.3.5 of the draft guidelines, which recognises that one size does not fit all when applying to the Framework.

Outdoors Queensland appreciates the detailed and thorough description of the framework for management of recreational water quality provided in section 2.2 of the draft guidelines.

Specific comments on the draft Chapter 3 – Microbial hazards from faecal sources:

Outdoors Queensland generally supports the proposed approach outlined in Chapter 3 regarding microbial hazards from faecal sources.

We understand the value of robust water quality monitoring, however suggest



that some of the measures outlined may not be practical for all water managers. For example, developing a baseline of at least 100 water quality samples over 5 years at the times of greatest recreational/cultural water use may be fine for large government agencies that operate water bodies, but may be completely impractical for a community organisation that has a small lake on a property where swimming and other water activities occur. It should be recognised that not all organisations that manage a recreational water body have the statistical expertise required to confidently calculate illness risks and associated 95th percentiles...

Outdoors Queensland supports the tactics outlined in section 3.6.4.2 regarding the importance of "Good-quality and near-real-time public information describing the recreational water environment" to enable people to make informed choices.

Outdoors Queensland supports the proposed approach set out in draft Chapter 3, and the guideline recommendation, noting that the Administrative Report states that this option takes into account "consideration of impacts resulting from unnecessary water site closures on communities and other stakeholders."

#### Specific comments on the draft Chapter 4 – Other microbial hazards:

The draft Chapter 4 presents a list of horrors regarding serious infections that can result from exposure to microbial hazards naturally present in surface waters. This chapter causes the reader to question how it is possible for humans to have survived and flourished for tens of thousands of years in a world rife with such dangers.

The draft guidelines note that infection from *Naegleria fowleri* is rare or very rare, but the description of primary amoebic meningoencephalitis (PAM), and the statement that "*N. fowleri* is sometimes referred to as a 'brain-eating amoeba' due to the consequences of PAM" combine to give the impression that swimming and other water-based recreational activities are only for dare-devils.

We note that the draft guidelines state that of the five confirmed cases and one probable case documented in Queensland since the year 2000, none of these have been related to recreational water exposures.

We support the focus on managing the risk of exposure to microbial hazards, along with implementing measures to raise public awareness of risks and opportunities to take personal preventative measures (such as avoiding full immersion where practical). However, we note that this type of public awareness campaign could run counter to campaigns encouraging people to be more physically active, and it also carries a risk of the authority being perceived as a "child who cried wolf" with the public.

We note that the Administrative report states that implementation of the guideline recommendation is technically feasible but context dependent, with recognition that feasibility may be constrained in remote or resource-limited settings where routine environmental monitoring or hazard mapping is not currently undertaken.

#### Specific comments on the draft Chapter 5 – Harmful algal and cyanobacterial blooms in freshwater and marine waters:

Outdoors Queensland generally supports the Guideline recommendation set



out in draft chapter 5.

We note the following statement provided in 5.1 Overview: "The formation of harmful algal and cyanobacterial blooms is a natural phenomenon caused by various environmental conditions. However, over recent decades their frequency, intensity and geographic distribution appear to have increased in inland water bodies and the ocean (Chorus and Welker 2021; Glibert et al. 2018)."

Closures of water bodies (marine and freshwater) to recreational activities based on algal and cyanobacterial blooms have significant impacts on outdoor activities (outdoor recreation, nature-based tourism, outdoor health and outdoor/environmental education).

Outdoors Queensland supports the alert level framework for cyanobacteria set out in section 5.4.2.1, and the adoption of alert levels for triggering short-term responses set out in section 5.4.2.2.

We support the use of biomass triggers in the alert level framework to address undue restrictions on recreational use, when compared to potential outcomes when cell count triggers are used.

Outdoors Queensland generally supports the public health advisories and warnings recommended in section 5.4.6.

#### Specific comments on the draft Chapter 6 – Chemical hazards:

Outdoors Queensland supports the simple screening approach recommended, however we share the concern expressed in the Health benefits and harms section of the Administrative Report as follows:

"In addition, conservative screening values could potentially overestimate the health risks, especially if they assume daily swimming by the local population that doesn't accurately reflect the local use of the water body. Overestimation of health risks may result in unnecessary site closures or restricted activities which may disadvantage communities if there are limited recreational water sites available in the event of an increase in exceedance."

Accordingly, we support the proposed recommendation to move from 10 times the Australian drinking water guideline value to 20 times that value for the default chemical hazard screening values.

#### Specific comments on the draft Chapter 7 – Aesthetic aspects:

Outdoors Queensland supports the guideline recommendation that:

Recreational water bodies should be aesthetically acceptable to recreational water users, and

The water should be free from: visible materials that may settle to form objectionable deposits; floating debris, oil, scum and other matter; substances producing objectionable colour, odour, taste or turbidity and; substances and conditions that produce undesirable aquatic life.

We understand that this recommendation aligns with the World Health Organisation guidelines, and agree that aesthetic quality is important for public confidence and recreational/cultural use.



Specific comments on the draft Chapter 8 – Radiation in recreational water:

Outdoors Queensland supports the guideline recommendation, including adoption of the reference level of 10 millisievert per year, rather than the alternative option of 1 millisievert per year, discussed in the Administrative Report.

Specific comments on any of the draft supporting information sheets or tools:

Outdoors Queensland suggests that the Information sheet - Water quality risk management planning checklist set out in Table 1 of the draft Guidelines may be appropriate for large government agencies, however it would appear to be beyond what could reasonably be expected for organisations with a limited resources. We suggest that a simplified version could be created for small business including community organisations.

The comment above regarding the Information sheet - Water quality risk management planning checklist applies to the other Information Sheets provided, which have actions that are beyond the scope for many smaller outdoor operators who manage water bodies. For example, the Information sheet - Sanitary inspections expects the organisation to conduct a systematic qualitative assessment of a recreational water catchment's susceptibility to various hazards, including carrying out field inspections across the catchment and interviewing staff from various authorities up to and including the state or territory environment protection agency.

The Water Quality Risk Management Plan template is a valuable resource which should help make this process more accessible - we suggest this be made available in an online format that organisations could download, modify and complete to ensure consistency across water body managers.

Outdoors Queensland looks forward to further involvement in this important process. We would be pleased to provide additional detail regarding elements of this submission.

We understand that this submission may be published as part of the consultation process. If you have any queries, please contact us.

Yours sincerely,



Dom Courtney

Executive Officer / Company Secretary

