



Western Australian Network of
Alcohol & other Drug Agencies

5 December 2025

Alison Cameron
Acting Deputy Ombudsman
Ombudsman Western Australia

Dear Alison

The Western Australian Network of Alcohol and other Drug Agencies (WANADA) welcomes the opportunity to contribute to the review of the Protected Entertainment Precinct Scheme (the PEP Scheme). We share the government's commitment to improving community safety and wellbeing in entertainment precincts. However, we believe reforms should always prioritise systemic, evidence-informed strategies that address the underlying drivers of complex social issues and alcohol-related harm.

WANADA is the independent voice of the alcohol and other drug sector in Western Australia. The alcohol and other drug sector includes services across a comprehensive continuum of care that spans prevention, community awareness and development, education, early intervention, support, harm reduction, assertive outreach, community-based counselling, residential treatment, post-treatment including transitional housing and residential after care. WANADA and its member service would like to see ongoing effort given to reduce alcohol and related harm.

Embedding the PEP scheme within the *Liquor Control Act 1988* establishes a link that antisocial behaviour, violence or unlawful behaviour in the context of alcohol consumption requires a distinct response beyond ordinary policing (even though the Director of Liquor Licensing can make an extended exclusion order "whether or not the behaviour arose from, or was related to, the use of liquor"). This adds an unnecessary layer of control that raises concerns about fairness and proportionality. The discretionary powers of police for short-term orders and the Director of Liquor Licensing without parliamentary, court or independent oversight is equally troubling.

*The National Drug Strategy 2017–2026*ⁱ advocates a balanced approach across demand reduction, supply reduction, and harm reduction to address alcohol (and other drug) related harms, and the *Liquor Control Act 1988* should primarily be about addressing harm minimisation from a structural standpoint. The current PEP Scheme policy provisions lean heavily on measures that miss the systemic drivers of many reasons for "unlawful, antisocial, violent, disorderly, offensive, indecent or threatening way." Rather than focusing on untransparent, exclusionary and individual-based measures that risk introducing human bias

and judgement into enforcement, reforms should strengthen population-level and venue-based strategies, including by prioritising:

Responsible Service of Alcohol (RSA)

- Enhance RSA training and compliance monitoring for all licensed venues.
- Relevant agencies and industry peak bodies should continue to support venues with practical tools to identify and manage intoxication.

Population-based public health policy

- Evidence shows restricting late-night trading and reducing outlet density lowers alcohol-related harm and violence.ⁱⁱ Consideration needs to be given to Perth's entertainment precincts with larger density of alcohol-related venues and sales, while introducing greater diversity into WA's night-time economy.
- Consider other population-based strategies such as introducing minimum (floor) price for alcohol products.
- Recognise the need for and awareness of referring to specialist or generalist alcohol and other drug services (across the range of different services and supports available) where appropriate.

Population-based community safety policy

- Review the implementation of fit-for-purpose environmental design planning specifically in entertainment precincts.ⁱⁱⁱ
- Foster collaboration safety and response planning, and initiatives involving local businesses, community members, and police.

It is WANADA's view that dedicated resources to a combination of these strategies mentioned above would create more lasting change to community safety. Thank you for the opportunity to provide comment.

Yours sincerely



Jill Rundle
CEO
WANADA

ⁱ Australian Government Department of Health, Disability and Ageing (2017) [*National Drug Strategy 2017-2026*](#).

ⁱⁱ Wilkinson C, Livingston M & Room R (2016) [*Impacts of changes to trading hours of liquor licenses on alcohol-related harm: a systematic review 2005-2015*](#).

ⁱⁱⁱ Government of Western Australia Department of Planning, Lands and Heritage and Western Australian Planning Commission (2023) [*Safer Places by Design Crime Prevention through Environmental Design Planning Guidelines*](#).