



19 September 2025

Ms Kelly Whitfield
General Manager, Policy and Reform
Department of Local Government, Industry Regulation and Safety
140 William St
Perth WA 6000

By email to: liquorreform@lgirs.wa.gov.au

Dear Ms Whitfield

Re: Tranche 2 liquor reforms

Thank you for the opportunity to make this submission to the Tranche 2 liquor reforms discussion paper. The Royal Australian and New Zealand College of Psychiatrists (RANZCP) WA Branch represents over 740 psychiatrists, including consultant and trainee members of the Faculty of Addiction Psychiatry who are experts in substance use and mental health.

The Branch has supported Cancer Council WA's campaign for the Minimum Unit Price (MUP) of alcohol since the Tranche 1 liquor reforms consultation in 2021. In 2022, the coalition campaigning for the MUP, of which we are a member, welcomed the McGowan Government's introduction of regulations on some alcohol purchases.

Tranche 2 liquor reform is an opportunity to manage key emerging drivers of alcohol consumption, such as online sales, and institute preventative population health measures such as the MUP. However, Tranche 2 is almost exclusively concerned with expanding access to alcohol through a range of measures, while failing to balance licencing decisions with potential public health outcomes.

[Cancer Council WA](#) has identified the online market as an area needing urgent reform and offered recommendations on best-practice regulatory approaches. The Branch fears that expanding trading hours and leaving online sales unregulated undercuts increased investment in treatment, care and support for alcohol-related conditions.

Alcohol is a psychoactive and carcinogenic substance with well-documented impacts on individual, family, and population health. Harmful alcohol consumption is at alarmingly high levels in WA: [each week](#), it leads to 402 hospitalisations (not including emergency) and 180 family violence assaults.

Our health system, particularly emergency departments, are currently over-stretched and under-resourced; an average of 16 ambulances a day are called out to attend for alcohol intoxication. WA has one of the highest alcohol-induced emergency presentations in the country, with 1 in 5 emergencies on a Saturday night due to alcohol. Each day in WA, [at least one person dies by suicide related to alcohol](#).

The RANZCP [advocates](#) for increased investment in evidence-based methods for reducing alcohol-related harm and the development of more effective prevention, early intervention and treatment models.

The Branch is disappointed that no preventative health measures are proposed in the Tranche 2 discussion paper. The approach is inconsistent with the State Government's focus on preventative health with the creation of a separate Cabinet portfolio and its commitment in 2024 to the national statement [Unlocking the Prevention Potential](#) action to end domestic, family and sexual violence.

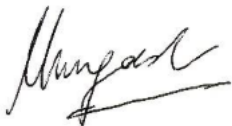
We note that the Mental Health Commission's proposed Strategic Directions 2025-2030 outline measures to integrate alcohol services within hospitals. The Branch supports this approach to effectively address the complexities and frequency of co-occurring conditions in the community. It recognises the rising complexity of presentations in comorbid conditions seen in our public health system.

We are concerned that the Tranche 2 reforms will potentially exacerbate alcohol-related harm and worsen population health outcomes. To counter the potential impact, the proposal should recognise the [distinct risks of harms](#) posed by online sales of alcohol, a mode more often used by high-risk drinkers.

The RANZCP [recommends](#) that government agencies address alcohol-related harm as a mental health condition, in ways that combat stigma and empower those who seek treatment and support. Regulatory measures and support from sectors outside of health are required to reduce the levels of alcohol-related harm and improve community mental health and wellbeing. The Branch recommends that Tranche 2 liquor reform incorporates evidence-based policies such as the MUP which minimise alcohol-related harm.

The Branch aims to provide evidence-based solutions as part of our collective effort to improve the mental health of the community. We would welcome an opportunity to discuss the MUP and online sales regulation further during this consultation period. If you have any questions, or to schedule a meeting, please contact Policy and Advocacy Advisor, Dr Jasmina Brankovich, at jasmina.brankovich@ranzcp.org.

Yours sincerely



Dr Murugesh Nidyananda
Chair, RANZCP Western Australia Branch Committee