

An Implementation Proposal for Reintegration of Casinos into Turkish Tourism

Kumarhanelerin Türk Turizmine Yeniden Entegrasyonuna Yönelik Bir Uygulama Önerisi¹

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ABSTRACT

Casinos are places where various gambling games are offered as a service to satisfy people's desire for pleasure, entertainment, and enrichment. The casino industry generates high revenues from these activities worldwide every year. In 2022, registered revenues from gambling activities worldwide totaled 449 billion dollars. According to the development trends of the gambling industry in previous years, it is estimated that this economic size will reach 765 billion dollars in 2027. Although Turkey has been among the top ten countries in the world in terms of the number of tourist arrivals for many years, it has never been in the top ten in terms of tourism revenues, and the banning of casinos in 1998 deprived it of this enormous income. In order to achieve the macro and micro-economic objectives, such as achieving the annual revenue of 100 billion dollars targeted for Turkish tourism in 2028, spreading tourism activities all year round, providing additional employment throughout the country, and reducing income distribution differences between regions, casinos should be reopened. In this study, an application proposal is described to bring casinos back to tourism in a way that serves only foreign tourists without harming the social and economic structure of the Turkish people. In this context, an application that relates the regions where casinos should be opened, employment conditions, security and control procedures, and other principles with examples from around the world is proposed.

Key Words: Gambling Tourism, Casinos, Turkish Tourism, Gambling in Turkey.

ÖZET

Kumarhaneler, insanların zevk, eğlence ve zenginleşme isteklerini karşılamak üzere çeşitli kumar oyunlarının hizmet olarak sunulduğu yerlerdir. Kumarhane endüstrisi bu faaliyetlerden her yıl dünya genelinde yüksek gelirler elde etmektedir. 2022 yılında dünya genelinde kumar faaliyetlerinden elde edilen kayıtlı gelirlerin toplamı 449 milyar dolardır. Kumar endüstrisinin önceki yıllardaki gelişim trendlerine göre 2027 yılında bu ekonomik büyüklüğün 765 milyar dolara ulaşacağı tahmin edilmektedir. Gelen turist sayısına göre uzun yıllardır dünyada ilk on ülke içerisinde yer almasına rağmen hiçbir zaman turizm gelirleri açısından ilk ona giremeyen Türkiye turizmi, kumarhanelerin 1998 yılında yasaklanması ile bu muazzam gelirden mahrum kalmıştır. Türk turizmi için 2028 yılında hedeflenen yıllık 100 milyar dolarlık gelirin elde edilebilmesi, turizm faaliyetlerinin tüm yıla yayılabilmesi, ülke genelinde ek istihdamın sağlanabilmesi ve bölgeler arası gelir dağılımı farklılıklarının azaltılabilmesi gibi makro ve mikro ekonomik hedeflere ulaşabilmek için kumarhanelerin tekrar faaliyete geçirilmesi gerekmektedir. Çalışmada, kumarhanelerin Türk Halkının sosyal ve ekonomik yapısına zarar vermeden, sadece yabancı turistlere hizmet sunacak şekilde turizme kazandırılmasına yönelik uygulama önerisi anlatılmaktadır. Bu kapsamda, kumarhanelerin açılması gereken bölgeleri, istihdam şartlarını, güvenlik ve kontrol prosedürlerini ve diğer esasları dünyadaki örnekler ile ilişkilendiren uygulama önerilmiştir.

Anahtar Kelimeler: Kumar Turizmi, Kumarhaneler, Türk Turizmi, Türkiye'de Kumar.

INTRODUCTION

Individuals may seek different experiences with changes in income level and entertainment understanding. This search varies according to moral values, psychological mood disorders, culture, and education level of societies and individuals, and the individual may find himself sitting in front of a croupier or participating in a lottery draw. Gambling, which is defined as "a game of chance played by putting money in the center" (TDK, 2023), was also played in the lives of gladiators until the 5th century, but the winners of the game were always "masters." This pathological passion of Dostoyevsky, who crowned his fondness for gambling with his novel *The Gambler*, was described by Sigmund Freud, the master of psychoanalysis (Freud, 1981: 26). In Turkey, a documentary filmed in 1983 (trtrarsiv.com) dealt with the psycho-social destruction caused by gambling or addiction in the lives of individuals. However, apart from sociology, psychology, and literature, gambling should also be analyzed in terms of tourism, tourism economics, and macro-economics because, in some countries where cultural, coastal, gastronomic, and winter-skiing tourism diversity is seen, gambling tourism activity is also seen and makes significant nominal contributions to the welfare levels of countries.

Gambling is a specific economic activity that significantly affects society in many ways. Although it is mainly characterized by negative impacts on the lives of individuals and their families, it has a positive economic impact on the public budgets of states, regions, and municipalities (Fiedor et al., 2017:104). Casinos are always a controversial issue for national and local governments, primarily due to their complex economic and criminal impacts (Nichols and Tosun, 2017: 1).

In Turkey, the stagflation crises in the late 1970s, which were characterized by foreign exchange inflow problems, devaluation, inflation, and an increase in unemployment rates, were tried to be overcome with a liberal approach, and tourism played an important role in narrowing the gap in the balance of payments. Law No. 2634 on Tourism Incentives, which was adopted in 1982, was amended in 1997 to include an article on games of chance (Özdemir, 1992: 34) along with many other regulations applied to the tourism sector, with the annotation "It is forbidden to open places where games of chance can be played, either independently or connected to tourism establishments" (mevzuat.gov.tr). As of 1998, casino operations were banned, and 78 establishments were closed down. In the year casino operations were banned, it was claimed that the sector was a \$1 million sector and contributed approximately £80 million to tax revenues. With the ban, approximately twenty thousand employees employed in this sector in Turkey became unemployed. The number of tourists traveling from Russia and Israel for gambling purposes has decreased (BBC News, 1998), and these tourists have turned to destinations such as the Turkish Republic of Northern Cyprus (TRNC), Greece, Romania, and Las Vegas (USA). Visits from Turkey to the TRNC for gambling purposes have also increased as the industry avoids losing customers (Avcı and Aşkoğlu, 1998: 22).

Although Turkey has been among the top ten countries in the world in terms of the number of tourist arrivals for many years, it has never been among the top ten in terms of tourism revenues and was deprived of this enormous income with the banning of casinos in 1997. In order to achieve the macro and micro-economic targets such as the annual revenue of 70 billion dollars targeted for Turkey's tourism in 2023, to spread tourism activities throughout the year, to provide additional employment throughout the country, and to reduce income distribution differences between regions, casinos should be reactivated.

GAMBLING AND GAMING INDUSTRY

The casinos and games of the chance market comprise all types of betting and gaming. The casino segment includes card games, roulette, slot machines in casinos, tipping, and entrance fees but excludes additional revenues such as food, beverages, and accommodation. The lottery segment covers all government, private, and charitable lotteries and includes traditional raffles, scratch-off games, and similar products lottery operators offer. The sports betting and related segment covers gambling on the outcome of horse races, football matches, and other events and includes gambling services offered by bookmakers and joint/aggregator betting operators (Marketline, 2018:7).

According to the global data of the casino and gaming industry presented by Marketline Industry Profile in April 2022 under the title *Global Casinos & Gaming*, casinos are the largest segment of the global casino and gaming industry, accounting for 37.6% of the total value of the industry. The United States accounts for 37.6 percent of the global casino and gaming industry value (statista.com; casino.org).

The global casinos market, valued at US\$157.5 billion in 2022, is expected to grow to US\$224.1 billion by 2030, with a steady CAGR of 4.5% from 2022 to 2030. This report offers a comprehensive analysis of the worldwide casino market, presenting insights into recent trends, historical data, and future forecasts. It covers various market facets, including casinos, gambling machines, gaming tables, and more. The analysis includes

geographical regions, providing annual sales figures, growth rates, and percentage breakdowns from 2022 to 2030. This data serves as a valuable resource for understanding the dynamics and potential of the global casino industry. Within the report, the segment of Gambling Machines is expected to achieve a 4.9% CAGR, reaching US\$108.4 billion by the end of the analysis period. Considering the ongoing post-pandemic recovery, the Gaming Tables segment is reevaluated to a revised 4.3% CAGR for the next eight years. In the U.S., the casino market is estimated at US\$72 billion in 2022. Meanwhile, the Asia-Pacific region is anticipated to reach a market size of US\$84.8 billion by 2030, with a CAGR of 5.2% between 2022 and 2030. Additionally, noteworthy geographic markets include Canada and Europe, with projected growth rates of 3.6% and 4.0%, respectively, over the 2022-2030. Among European countries, Germany is forecasted to experience approximately 4.2% CAGR (researchandmarkets.com).

According to Ibisworld Industry Reports (2023), there are four general observations about the gambling industry (IIR, 2023):

- **The pandemic wreaked havoc on international tourism, spelling trouble for global casinos.** Many are still reeling from plummeting visitation rates, especially in areas where pandemic-era restrictions persist. Others have experienced a swift rebound in both visitors and revenue.
- **Working-age adults are the target market for casinos.** Adults between 30 and 60 spend the most at casinos, as they tend to have more excellent financial stability and the means to travel and spend, compared with younger and older demographics.
- **Regulation is key.** Countries with newly legalized gambling operations tend to attract significant numbers of prospective casino owners, but those with a history of a welcoming regulatory environment dominate by numbers.
- **Most competition occurs on a national and regional basis.** Few casinos or online gambling companies have significant international reach, so most competition occurs between localized businesses. Certain areas of countries tend to attract large concentrations of casinos.
- **Visitation rates continue to lag for many big-name casinos.** International travel nearly stopped at the height of the pandemic and was slow to rebound, spelling trouble for many large tourist-destination casinos.
- **Consumers are spending more, but not necessarily on gambling.** Economic volatility typically spells trouble for gambling-related businesses, as all but chronic gamblers will reduce such spending when conditions are rough.

Table 1. Gambling and Gaming Market Trends & Drivers from 2023 to Future

Trends	Drivers
Online Casinos Propel Growth Prospects in Overall Casinos Market	Increasing Internet Penetration Drives Growth in Online Casino Gaming Market
Notable Trends in Online Casino Market	Online Casinos Attract Broader Demographics
Slot Streamers Gain Popularity in Online Casinos	More Payment Options & Welcome Bonuses
Video Game Themes in Online Slots	Demographic Structure of Online Casino Players
Responsible Gambling Comes to the Fore	DDoS Attack: Potent Cyber Threat to Online Casino
Growing Role of Internet and Mobile Technologies, Chatbots for Customer Support in Online Casinos	Percentage Share of Mobile Phones of the Total Internet Time: 2014-2020E
Monumental Advances in Mobile Technology Drive Popularity of Mobile Casinos	Changing Consumer Gambling Habits and Demographics Impact Casinos Market
Smartphone Proliferation Presents an Opportunity for Mobile Online Casinos	Gambling Apps Contribute to the Rising Popularity of Online Casinos
Social Casinos Market Poised to Make Healthy Gains	Cyberattacks Emerge as a Key Concern for Online Casinos
Volatile Slot Machines with High Rewards Grow in Favor	Growing Participation of Women in Casinos
Global Social Casinos Market: Breakdown of Revenues (in %) for 2020E	Relaxation in Gambling Regulations and Legalization of Gambling in Several Nations

Online Casinos vs Social Casinos	Gambling Laws in Select Countries
Use of Smartwatches for Placing Bets and Improve iGaming Experience Gains Traction	Casino Tourism: The Close Relation Between Casinos and Tourism Industry Hit by COVID-19 Pandemic
New Table Games Become an Attraction for Casino Gamblers	COVID-19 Impact on Tourism Industry Affects Casino Revenues
Casinos Leverage on IoT Analytics to Gain Competitive Edge	Cryptocurrency to Play an Increasing Role in the Gambling World
Data Analytics Assist in Improving Experience of Casino Gamers	Slot Machines: A Popular Casino Gambling Activity Worldwide
Physical and Online Casinos Focus on Improving Security of Operations	Advancements in Table Games Vital to Improving Customer Experience and Revenue Generation
Blockchain Technology Brings in a Revolution	In-Play Wagering and Bar Top Gaming
Casino Trends Poised to Transform Casino Industry in the Future	Bigger Slot Machines
Gamification	Skill-based Games
New Options for Differentiation	GPS & RFID for Targeted Advertising
Live & Interactive Gaming	Growing Investments into VR and AR Technologies
Technology Innovations Shape the Casino Industry	Artificial Intelligence & Robotics

Source: Created by the authors from "Global Casinos Strategic Business Report 2023".

Table 1 presents the trends and drivers of the gambling and games of chance market. The factors evaluated within this scope are divided into main topics such as changing player behaviors and expectations, new technologies used or used in gambling, changes in existing gambling types, payment instruments, casino security protocols, and social and economic global events affecting the sector. The effects of these factors are expected to impact the industry, some in the short term and some in the medium and long term.

THE IMPACT OF CASINOS

The unprecedented growth and expansion of the gambling industry have had many positive and negative economic, socio-cultural, and environmental impacts. These impacts include positive benefits (such as the increase in earned incomes, improvement of social welfare, and depletion of public facilities) and negative consequences (such as the increase in commodity prices, increase in crime rates, and increase of various pollutants). These events are considered noteworthy as they will directly or indirectly affect residents to a certain extent (Shou and Yeong, 2015: 285). Many studies have been conducted on the effects of casinos on the economy, social structure, crime rates and the environment (Christiansen, 1998; Eadington, 1999; McCartney, 2005; Kamat et al., 2016; Wu and Wortman, 2009; Fiedor et al., 2017; Nichols and Tosun, 2017, Dennison et al. 2021, Lim and To, 2021, Boto-Garcia and Perez, 2023). The multidimensional effects of casinos can be analyzed under four main headings.

Economic Impacts

It has been stated in many studies that casinos have favorable financial and fiscal contributions to national economies (Rephann et al., 1997; Eadington, 1999; Kang et al., 2008; Siu, 2007; Nichols et al., 2015; Walker, 2013; Wan, 2012, Lim and To, 2021). The essential factor for governments to legalize gambling activities is the considerable economic benefit (Walker, 2013: 9). Farmaki et al. (2015), in their study on the development of tourism in the Turkish Republic of Northern Cyprus, concluded that civic groups are uncomfortable with the increasing number of casinos, but at the same time recognize that casinos are an essential source of income. Another concrete example is Macau, which increased its annual casino revenues from 2.1 billion dollars to 43.94 billion dollars in 2014 with the opening of casinos in 2002. According to reports, regions with casinos show an increase in per capita income compared to other non-touristy regions. Likewise, the increase in revenue from gaming tax has led to increased benefits for Macau citizens, such as numerous financial resources (Benton, 2015: 9-11).

In addition to direct economic benefits, the establishment of casinos can increase other opportunities for recreation, leisure, and entertainment activities in cities. Many casinos offer gaming opportunities, which can generate income for restaurants, pubs, bars, retail outlets, and other businesses. In addition to this effect, it also creates new job opportunities for the people who will work in these businesses.

Social Impacts

Analyzing the social costs of casinos, Walker (2007) stated that for a cost to be counted as a social cost of casinos, by definition, it must be social rather than private or personal. It must cause an absolute decrease in social wealth, and the cost must originate only from casinos. Long (1996), in his study of the attitudes of local people towards the development of casinos in the USA, found that the public, in general, had favorable opinions about the effects of casinos on employment but had negative opinions in terms of traffic congestion, crowding, and gambling-related crimes. Janes and Collison (2004) found that the number of problem gamblers increased from 1995 to 2000 in communities where gambling was prevalent. They also found that problems related to child neglect and family issues became more prevalent in these areas during this period. Wu and Chen (2015) found that, from a sociological perspective, the impact of casinos has changed traditional relationships between communities in areas of local acceptance and that these effects are more pronounced in limited geographical areas where human relationships are more substantial.

The effects of gambling on society are essentially a combination of economic, crime, and environmental impacts. From this point of view, it is impossible to avoid these effects in societies where gambling exists; only measures can be taken to prevent the effects from becoming destructive.

Impact on Crime Rates

As a result of long-term studies conducted in areas where casinos operate, it has been concluded that crime rates in these areas have increased (Grinols and Mustard, 2006). Many studies have been conducted on the relationship between gambling activities and various crimes such as theft (vehicle, house, hotel room and pickpocketing), fraud, forgery, extortion, murder, drug use, rape and prostitution in areas where casinos are located (Stitt et al., 2003; Grinols & Mustard, 2006; Nichols & Tosun, 2017; Banks & Waugh, 2019; Dennison et al., 2021). In the study conducted by Nichols and Tosun (2017) across the USA, it was concluded that in the regions where casinos were opened, crimes increased significantly within the first two years after the opening date. However, there was no significant effect in the long term (1990-2012). In Grinols and Mustard's (2006) research on the relationship between the number of casinos and crime rates in a region, they put forward two potential situations where casinos can reduce crime. First, if casinos offer better job opportunities for low-skilled workers, crime may fall. Secondly, economic developments resulting from casinos may have effects that may reduce crime. On the other hand, Grinols and Mustard said there are five ways in which casinos can cause an increase in crime. First, casinos may harm economic development by reducing the local resource economy. Second, casinos can lead to an increase in the proceeds of crime, leading to more crime. Third, pathological gambling may increase with the spread of casinos, and this may lead to more crime. Fourth, casinos can also attract criminals to an area, leading to more crime. Finally, casinos may cause a change in the local population, which is more favorable to commit crime (Grinols and Mustard, 2006: 31-32).

Environmental Impacts

Lee and Back (2006) noted that casino businesses produce positive local environmental outcomes, including preserving the natural environment and ecological resources, historic buildings and cultural heritage, improved public transport, improvements in infrastructure, higher medical standards, increased recreational areas, and urban revitalization. Wu and Chen (2015) concluded that casinos, which are becoming more and more common, often cause environmental degradation due to zoning plans that are forcibly changed (sometimes also at sea) to meet growing tourist needs.

The negative environmental impacts of casinos can be listed as traffic congestion, parking difficulties, increased litter, soil erosion, reduced air quality, reduced natural beauty, inadequate public infrastructure, and overpopulation (Shou and Yeong, 2015: 288).

Gambling Tourism

There are many studies (Yokomitsu et al., 2021; Pazarcıkcı & Altıntoprak, 2020; Carter, 2016; Ronzitti et al, 2015; Kaya & Aslan, 1999; Lesieur & Custer, 1984) as well as studies examining the relationship and effects of gambling with tourism (Lieber, 1989; Nickerson, 1995; Greenwood & Dwyer, 2017; Ateş & Sunar, 2019; Türkmen, 2020). Tourism is a sector that diversifies day by day with the needs of people and creates niche markets. In some countries where individuals are frequently involved in culture, sea-sun-sand, gastronomy, religion, and winter-ski tourism, gambling tourism activities are also seen. Countries such as the United States of America, China, Australia, New Zealand, the United Kingdom, Germany, Austria, France, France, the United

Kingdom, the Turkish Republic of Northern Cyprus, Switzerland, and Italy can be given to the countries where gambling tourism is also included in the supply of tourism diversity.

Casinos are often seen as an effective tool to attract tourists to destinations (Wong and Rosenbaum, 2012: 32). Gambling is an entertainment product. It can not only provide enjoyment but also enhance the attractiveness of the destination (Luo et al., 2016: 3). Tourists visiting gambling destinations are likely to participate in gambling activities to some degree or a great extent. Therefore, their gambling experience contributes to evaluating their experience at the destination (Masiero, 2017: 676).

Gambling tourism is one of the forms of special interest tourism and is becoming more and more concentrated within tourism activities. Gambling tourism can be defined as a tour of tourists inspired by experiences based on the desire to have fun and win offered to casino visitors (Bulatovic et al., 2017: 1).

In his study titled "Tourism and Gambling," Leiper (1989) touched upon the reasons underlying gambling behavior and classified gamblers into five categories according to their purposes and mentioned touristic behavior. He presented data on gambling tourism in destinations such as Monte Carlo - Monaco, Macau - China, Kathmandu - Nepal, Genting Highlands - Malaysia, Darwin, and Tweed Heads - Australia based on observations and interviews with officials of tourism organizations. According to the Monaco casino data analyzed by Leiper, the Monte Carlo casino was opened in 1856. Monte Carlo has become an attraction on the Riviera holiday strip, and in this case, having the only legal casino in Europe for years, gambling being declared illegal in France in 1838 and in Germany in 1866 and its closure, and Francois Blanc and his brother Louis Blanc, who bought Monte Carlo casino and turned it into a touristic attraction, are seen as essential factors. Another gambling center mentioned by Leiper was the Genting Highlands in Malaysia, where, according to the data, almost all of the gamblers are Chinese from nearby Malaysia and Singapore. Every year, one million tourists visit Malaysia from further afield. In Macau, whose economy depends on gambling and sports betting, gamblers come mainly from Hong Kong or other cities where gambling is not allowed (Leiper, 1989: 269-272).

Nickerson (1995) approached the relationship between tourism and gambling in Deadwood- South Dakota- USA, with the content analysis method and stated that Deadwood was opened for gold mining in the 1870s, gambling was banned in 1947, but the first legal casino was opened in 1989 with certain restrictions. According to the data on tourism and economy included in the research, Deadwood earned a gross income of approximately 27.2 million dollars in the first sixteen months after the casino's opening, and approximately 2.2 million dollars of this gross income was paid as tax. According to Nickerson, the trends in the newspaper headlines used in the research show that gambling is a vital player in the development of tourism and the economic growth of society. After the introduction of gambling in a small community, where gambling was seen as the answer to economic development, social problems associated with gambling have become more widespread, but these problems are caused by gambling addictions, which are treated as pathological problems; addiction leads to personal financial losses, crime, and abuse. It was suggested that measures should be taken by South Dakota state government agencies, mental health, substance abuse treatment specialists, educators, and the gambling industry to minimize crime rates (Nickerson, 1995: 62- 65).

IMPLEMENTATION PROPOSAL

The success of gambling tourism businesses does not occur by chance or lucky circumstances. However, it depends on multi-step plans, renovation of the tourist destination, preparedness to gambling income, seeking strategic partners, investing in making the surrounding area more attractive, and, of course, limiting the entry of new competitors (Metaxas and Folinis, 2016: 12). Within the scope of these general requirements, an eight-step application for the reintegration of casinos into the existing tourism sector in Turkey has been prepared, taking into account Turkish societal values and sensitivities. The outline of the implementation is as follows:

- i. **Determination of the Target Audience:** One of the biggest problems when casinos were legal in Turkey was the undesirable incidents due to the high amounts of money lost by Turkish citizens in casinos. In the period starting with the opening of casinos, Turkish citizens should be strictly prohibited from entering these establishments. Although this issue was started with a similar application in the past, Turkish citizens also gained the right to enter casinos due to the Constitutional Court's termination of this application. Depending on the regions or business types where casinos will be opened, in order to prevent this situation from happening again,

necessary legal arrangements should also be made before the casinos are opened. The casinos to be opened should be exclusively for foreigners and should be banned for those under the age of 25 and students, regardless of their nationality.

- ii. **Security and Control Protocols:** The security and control process is essential to ensure the entry targeted in the previous step. For this reason, within the scope of a system to be established with the support of today's modern technologies and with multiple control mechanisms, applications such as controlling and recording the entries with passports, establishing special security units in casinos with police support, storing and monitoring the security camera records of all casinos for a certain period by the General Directorate of Security with a Mobese-like system should be implemented. These controls should not only be directed at the customers, but also the persons employed in the casinos should be supervised during their working period, starting with the recruitment process.
- iii. **Financial and Financial Control Protocols:** One of the most essential concerns casinos create is that the monetary cycle in these enterprises may create undesirable situations (money laundering, tax evasion, etc.). In order to prevent possible negative situations, credit card and mobile payment methods should be prioritized, cash should be taken at the cash registers, the balance should be loaded to digital account cards to be opened in connection with passports to prevent informality, and the revenue accounts of casinos should be transferred to bank accounts daily. In addition to these practices, the accounting and financial records should be audited regularly in specific periods with the triple audit of the Ministry of Finance, Culture and Tourism, and independent audit companies.
- iv. **General Operating Protocols:** Since casinos are service-producing enterprises, it is necessary to establish a systematic order such as marketing activities, management of human and physical resources, maintenance of relations with the environment, and maintenance of general management activities that they need to maintain for their target audience. Protocols within this scope are essential for the effective and efficient functioning of other protocols.
- v. **Establishment Location Selection Protocols:** In casino establishment selection, a choice can be made between two extremes, namely a developed region and an undeveloped region. A developed tourism region with other advantages, such as infrastructure, etc., is an important support factor for the new casino to be established. The casino to be established in the undeveloped region, another option, will contribute to the region's development. At the site selection stage, a decision should be taken by a commission consisting of experts who will evaluate all social, economic, and environmental factors. Priority should be given to regions with a passenger-guaranteed airport following the tender specifications and where tourism and economic development are targeted (Southeast and Eastern Anatolia are prioritized), creating multiple benefits. Given that airports in Turkey are vital transfer centers for international flights, the opening of a casino in the international flight waiting and transfer area at the New Istanbul airport (SGH, Antalya, and Ankara) would also make a difference.
- vi. **Regulatory Protocols:** These are the protocols containing the legal regulations that need to be made during the establishment and operation of casinos. For these protocols, boards consisting of experts in the field of law, including people from the public and private sectors, should be established. At this stage, the legal regulations in the countries with casinos should be harmonized according to the conditions of Turkey. They should be created in a way that will provide advantages in case of possible problems or integration. Legal regulations should not be in a static structure; they should be updated in line with the experiences to be gained with the opening of casinos.
- vii. **Social Responsibility Support Protocols:** Casinos cause an increase in public resources by increasing tax revenues with the financial magnitudes they create. With increasing tax revenues, the state will provide services that will provide better opportunities to its citizens. Apart from this classical process, social responsibility projects directly supported by casinos should be carried out to eliminate the negative perception of casinos in society. A specific portion of the casino turnover should be transferred to social responsibility projects. These

projects should have content such as preventing the proceeds of crime, supporting the establishment of gambling addiction treatment research centers, supporting units that benefit all segments of society, such as schools and hospitals, and supporting people in need.

- viii. **Other Protocols:** This protocol was created to evaluate the issues not classified under the first seven headings and to evaluate them before and after the implementation revision.

For the casinos to be opened and brought to Turkey's tourism sector, these eight steps should be implemented in order. The participation of public institutions, tourism sector representatives, and non-governmental organizations should be ensured before implementation.

CONCLUSION

It has been stated that the problems brought by gambling are problems of pathological origin, which can be prevented by taking measures against the tendency to crime in places where gambling activities take place. Thus, countries can earn high incomes by meticulously creating gambling tourism destinations.

Turkey, which wants to brand itself in the international tourism market, has been deprived of billions of dollars of revenue as a result of both foreign and domestic tourists turning to other countries due to casinos that have been closed for more than 20 years. Turkey, which has updated its 2028 tourism targets to 100 million tourists and 100 billion USD in tourism revenue, needs to overcome the obstacles within the scope of these targets. In addition to these targets, the essential chance for Turkey, which is experiencing economic difficulties due to global and national developments, to overcome these difficulties is the reopening of casinos within the scope of gambling tourism. At this point, all tourism sector stakeholders and the public sector should collaborate, make decisions by considering Turkey's gains beyond individual interests, and implement these decisions urgently.

In this context, Turkey should launch gambling tourism as a type of tourism, but before that, the region where the gambling activity will take place should be determined and even that region should be turned into a settlement away from settlements, strict security and entry registration conditions should be provided, all kinds of possibilities that may cause social problems should be eliminated, and practices that may harm the environment should be avoided, In terms of energy efficiency, applications such as solar panels should be used, everything that the tourists coming for gambling tourism may need should be available in this settlement so that they can receive services for their purpose, very detailed entry records such as age and infectious diseases should be taken and these records should be reported to the relevant security units to ensure a criminal record investigation and the gambling customer portfolio should be carefully formed. In addition, the fact that Turkey does not favor gambling activities in the context of faith should be taken into consideration. It should be ensured that the compound or region to be opened for gambling tourism is established in a region far from the living area of the local people, as in the Genting Highlands example, and that there is no connection with the local people.

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