



A Case Against Cruise Ship Casino Gambling in Virginia Waters

Submitted by Protect-Virginia.org

Table of Contents

| | |
|----------------------------------------------------|----|
| Executive Summary..... | 3 |
| Introduction | 4 |
| Cruise Industry Background | 4 |
| Cruise Ship Casino Gambling..... | 5 |
| Detrimental Effects | 5 |
| Regulation and Enforcement | 6 |
| Cruise Ship Economics | 6 |
| Foreign-flagged Ships..... | 6 |
| Inflated Economic Benefits and “Pay to Play” | 6 |
| Unprotected Workers | 7 |
| Lobbying..... | 8 |
| Environmental Impacts | 9 |
| The State of Virginia Waters | 9 |
| Cruise Ship Pollution | 10 |
| Accidents and Violations..... | 14 |
| Community Impacts | 14 |
| Conclusion..... | 16 |

Executive Summary

This position paper addresses two major concerns related to cruise ship gaming in Virginia waters. The first is the harm associated with gaming in general and the lack of regulatory oversight on foreign-flagged cruise ships. Gambling can be addictive, impacting the lives of many individuals and their families, and offshore enforcement of Virginia regulations would be extremely challenging.

The second urgent issue concerns the fact that enabling offshore gambling will undoubtedly expand cruise ship presence in Virginia, by “rolling out a welcome mat,” according to a Princess Cruise Lines lobbyist. Virginia has a responsibility to examine this potential expansion in the broader context of environmental and cultural impacts, unfair labor practices, and competition with land-based businesses. We understand that the focus this subcommittee is narrower than the scope of the concerns expressed in this paper; but broader implications of cruise industry expansion resulting from on-board gambling in Virginia waters warrants full consideration and scrutiny due to well documented impacts of this industry.

Virtually all large cruise ships are built and registered outside the U.S. to avoid taxes and U.S. labor laws, while utilizing the infrastructure, emergency services and other amenities of the port cities they visit. On-board gambling facilities have a competitive advantage of lower staffing costs by avoiding US labor laws than land-based facilities. The overall economic benefits touted by the gambling industry are not typically realized by local communities and are often overshadowed by negative impacts. Cruise companies spend millions of dollars per year lobbying for their interests, thereby preventing meaningful federal, state, and local regulatory controls on their activities.

In Virginia, the potential for environmental harm from cruise ships is especially of concern for the Chesapeake Bay, its commercial and recreational fisheries, and the fragile ecosystems that support them. The cruise industry is notorious for violations of existing pollution regulations. Princess Cruise Lines received the largest ever maritime fine (\$40m in 2016) for felony convictions stemming from deliberate vessel pollution, with corporate-level knowledge, and violated their probation as recently as 2022 (\$20m fine).

Atmospheric pollution and ocean acidification, toxic discharges from exhaust scrubbers (which have been banned in 120 ports globally), and black, graywater and solid waste discharges into waterways are among the serious environmental concerns raised by greater cruise ship traffic in Virginia waters. Accidental pollution incidents, beyond normal operational impacts, are increasing in proportion to the burgeoning growth (both in size and numbers of ships) of the cruise industry.

Communities across the globe are pushing back against exploitation by cruise companies. The Commonwealth of Virginia has the responsibility and opportunity to more thoroughly examine this industry in the context of regulatory issues and a multitude of negative economic, environmental and character-altering impacts. We therefore urge this committee to request a study addendum to the Joint Legislative Audit and Review Commission (JLARC) “Oversight and Administration of Gaming in the Commonwealth” to ensure equivalent scrutiny and accountability for cruise ship gaming, and to consider the incentives this would provide to the rapidly expanding cruise ship industry.

Introduction

It is well known that the multibillion-dollar cruise industry continues to seek new markets for global expansion. They do so by touting the economic benefits to communities, while failing to address the negative impacts on coastal environments and populations. Their activities are largely self-regulated, even though they repeatedly fail at voluntary compliance. Most cruise ships are foreign registered to avoid taxes and U.S. labor laws, while taking full advantage of American infrastructure.

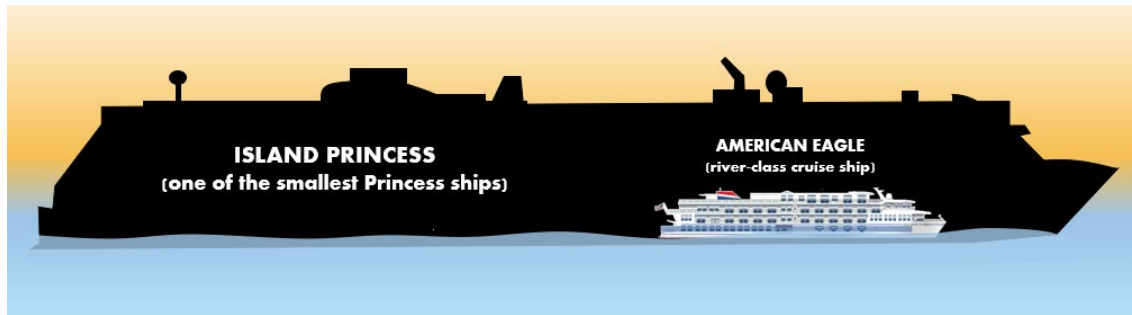
This paper will document the harmful effects of gambling and related challenges of on-board regulation, in the context of the broader impacts of cruise industry expansion in Virginia. A Princess Cruise Lines lobbyist stated at the public hearing in support of HB1478, allowing on-board gaming would “roll out the welcome mat for the cruise industry in Virginia.” It is our position that the Commonwealth and this committee should not only be asking *if cruise ship casino gaming is right for Virginia* but also, **if incentivizing and expanding the cruise industry is right for Virginia.**

Cruise Industry Background

Carnival Corporation, Royal Caribbean, and Norwegian Cruise Lines own the lion’s share of this \$25B industry. These three corporations are parent companies to more than 15 subsidiaries. For example, Carnival, the industry leader, is the parent company of Princess Cruises, Holland America, and several others. The sector is projected to see continued growth (estimated to reach \$30B in 2024) through leveraging current markets and finding new ones. It is very clear that cruise lines are not only looking to operate casinos in Virginia waters but also to find new ports of call. Any cruise ship legislation should be made with this in mind. Once in a market, the cruise industry will fight vigorously to keep it.

An important question when considering legislation on the cruise industry in Virginia is whether the scale of these ocean-class ships is compatible with port communities and the ecosystems they travel through. The ships are floating cities, and their size is hard to comprehend from photographs. The smaller ships have over 3,000 people on board (passengers & crew) and the largest one carries over 9,500. These ships are character-altering at any port they visit. In many small port cities in the U.S., where even one ship can double or triple the population of the port city, multiple ships arrive simultaneously and inundate the port with hundreds of thousands of passengers per year. The ships burn fuel 24 hours per day to generate the power to keep the lights, HVAC, and a multitude of other on-board amenities running. There is an enormous amount of waste that must be treated and managed.





Scale of the Cruise Industry Ships

It is important to note that this paper is focused on the “mega-class” pleasure cruise ships, not military or merchant ships. Also, there are smaller river-class vessels, with business models that minimize the negative impacts of their ships while providing transparent pricing for their guests. For example, [American Cruise Lines](#) ships burn low sulphur fuels, do not scrub exhaust pollutants into the water, are shore power equipped, have hull designs to minimize noise, and are built and registered in the U.S., therefore following U.S. labor and tax laws. Another example is [Uncruise](#), a cruise ship company with a core value of “Do the right thing” and with accountability as a core responsibility.

Cruise Ship Casino Gambling

It is estimated that 9 million Americans suffer from gambling addiction with an annual social cost of \$14 billion, according to the National Council on Problem Gambling. One [reference](#) states that “the casino has a 25% edge overall when it comes to slot machines.” It is no wonder the cruise industry wants to open its casinos in Virginia waters and has registered three lobbyists in Virginia to promote cruise ship gambling legislation.

Detrimental Effects

Virginia currently has multiple venues for gambling. It can be argued that shore-based gambling can boost the economy of a region – this is not the case for cruise ship gambling. In weighing the benefits of gambling, the cost to gamblers/gamers and their families must also be weighed. [UCLA Health](#) states that, “Like addictive drugs such as cocaine, heroin, nicotine and alcohol, gambling activates the brain’s reward system, which is powered by dopamine.” While the addicted person will definitely suffer from a gambling addiction, that person’s family will also face challenges. The stress that the problem gambler experiences may cause irritable behavior, secrecy, and arguments. Calls from creditors and bill collectors erode relationships.



According to the [Skywood Recovery Center](#) that treats gambling addiction, families, and especially the children of gambling addicts also suffer in many ways, including:

- “Emotional neglect and abandonment (and even physical abandonment) when one parent is consumed in an addiction.

- Stressed and irritable parents may lash out at children angrily, and even if they do not, these children can sense their parents' tension.
- Children of people with gambling addiction are at higher risk of experiencing their own addictions later in life."

Regulation and Enforcement

According to [The Shocking Reality of Cruise Ship Gambling](#) land-based casinos are subject to strict regulatory oversight, ensuring fair play and responsible gambling practices. On the other hand, cruise ship casinos operate under the regulations of the ship's flag state. This may vary depending on the country in which the ship is registered. While cruise lines may strive to uphold fair gaming practices, the level of regulatory oversight may differ from that of land-based casinos. Regulation and enforcement of on-board gambling can be complex. There is machine certification, minimum age requirements, addiction intervention, conflict and dispute resolution, and more. In a [Guardian article](#), John Kavanagh of Pacific Maritime Lawyers says: "Pragmatically, the flag state has responsibility for investigating issues with that ship wherever it is, but the further away that ship is from home, the logistics of that make it very difficult." The cruise industry's preference is always self-regulation, but as can be seen from their pollution record, self-regulation is rarely effective.

Cruise Ship Economics

Foreign-flagged Ships

Most cruise ships are registered outside the United States and fly "flags of convenience." This greatly reduces their U.S. tax burden on gambling profits and their compliance with U.S. labor laws, conferring a competitive advantage over shore-based businesses, including casinos. The article, [Economics of Cruise Ships](#), states that, "According to annual report filings, the major cruise lines pay an average tax rate of 0.8%." Thus, the industry exploits U.S. infrastructure but does not give back its fair share (the Federal corporate tax rate is 21%). The various port and permit fees required of cruise lines do not adequately compensate states and localities for use of personnel, infrastructure, or for environmental and cultural impacts.

The Congressional Research Service [report](#) warned that the complicated legal structure behind cruise ships, and their flags-of-convenience system, makes it difficult to enforce international standards to prevent or investigate environmental accidents, due to the poor response in many cases from the countries where the vessels are registered. Although not a cruise ship, the vessel that recently [collapsed the Keystone Bridge](#) in Baltimore is a foreign-flagged ship that "follows the regulations enforced by that country despite sailing out of an American port," according to [News Nation](#). The article also states, "the use of a foreign-built ship sailing out of an American port follows a trend in which the [U.S. Department of Transportation](#) reported a significant drop in American-built ships being used in international trade."

Inflated Economic Benefits and "Pay to Play"

The price of the cruise passenger's ticket is not how the cruise industry makes its profit. The ticket is essentially a loss-leader to bring vacationers to the ship to up-sell amenities such as dining, shopping, and gambling on board. In this sense, the ports of call are an inconvenience, in that they take passengers off the ship. This industry works hard to minimize dollars spent in localities and maximize spending on board.

A recent study, [The Economics of Cruise Tourism in Key West: Behind the Cruise Industry's Propaganda Veil](#), states that the dollars spent per passenger are roughly 20% to 70% lower than the industry claims. It also states that “the government receives less in cruise port fees than the industry claims.”

There is no evidence to support the industry’s claim that cruise tourism “converts” into longer term stayover visits, and “stayover tourists in Key West and other ports spend far more per day and per visit than cruise passengers.”



Spending by Cruise Ship Passengers

This same report states, “In all ports, including Key West, cruise lines negotiate ‘pay-to-play’ agreements that compel onshore tour operators and retail businesses to pay to do business with the cruise lines (see graphic below). This lucrative practice is part of the cruise lines’ business model but is not clearly described or tallied in any of the cruise industry commissioned studies of the economic impacts of cruise tourism.”



Cruise line commissions therefore constitute pay-to-play cash flow back to the cruise lines and a significant loss of revenue for local businesses and cruise destinations like Key West.

Lucrative System of On-shore Commissions

Another [study](#) in Victoria, British Columbia, found that cruise tourism accounted for 12% of the total number of visitors, but only 2% of tourism spending.

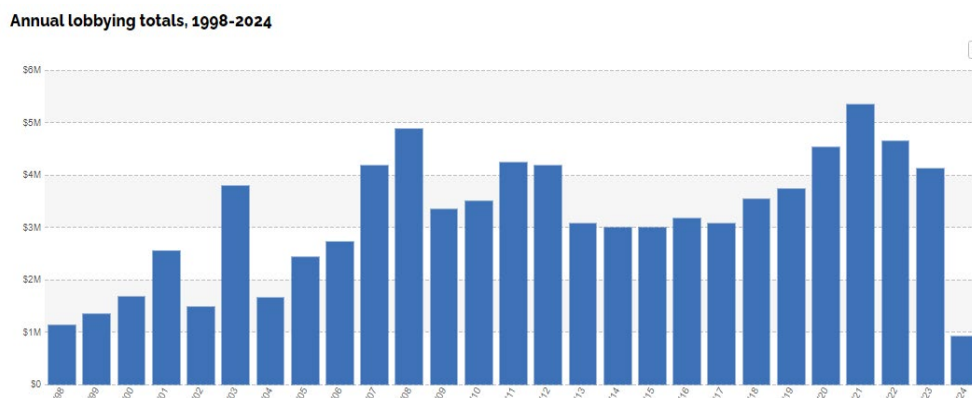
Unprotected Workers

U.S. laws or regulations protecting land-based workers do not generally apply to crews of foreign-flagged ships. The industry will argue there are international regulations they comply with, but according to the article, [Journey Away from the laws of the United States](#), “The database compiled by Columbia University's School of Journalism shows that between 1998 and 2015, various port authorities identified at least 318 deficiencies related to the crew of some 80 vessels, the majority detected in European ports. Poor living and working conditions, safety failures, inadequate medical care, as well as crew members

who do not meet the minimum requirements to work on a ship are some of these deficiencies.” Other questionable labor practices, [including fire/rehire strategies](#) to maximize profits, have been implemented by Carnival Corporation as recently as 2023.

Lobbying

According to [Open Secrets](#), the cruise industry currently has 29 registered lobbyists in the U.S. and has been spending millions of dollars per year.



Annual Cruise Industry Funding for Lobbyists

U.S. Congressman Sam Farr tried four times to get federal cruise ship environmental legislation passed, but he never got enough support to get beyond the cruise lobby.

“The lobbying work,” Farr said in an interview with [Univision News](#), “has prevented Congress from even considering reviewing a third bill — the Clean Cruise Ship Statute — which seeks to prohibit cruise ships, regardless of their flag or the nationality of their owner company, from dumping wastewater, garbage and other polluting substances into the waters near the coasts of the United States. Preventing all of this is costly, and cruise lines don’t want to spend money operating wastewater treatment plants on their ships”. The U.S. currently requires ships to be only three miles from shore before dumping raw sewage, whereas UN international regulations (under MARPOL Annex IV, to which the U.S. is not a signatory) sets the limit at twelve miles.

Virginia now has three registered lobbyists working on behalf of Princess Cruise Lines to promote the cruise industry in the Commonwealth. In late 2022 and 2023, they successfully lobbied for legislation to fund a cruise ship pier in Yorktown, Virginia. This was all done behind the scenes without citizen input. It was only through a concerted effort from the community, after the fact, that the project was halted and the funding rescinded.

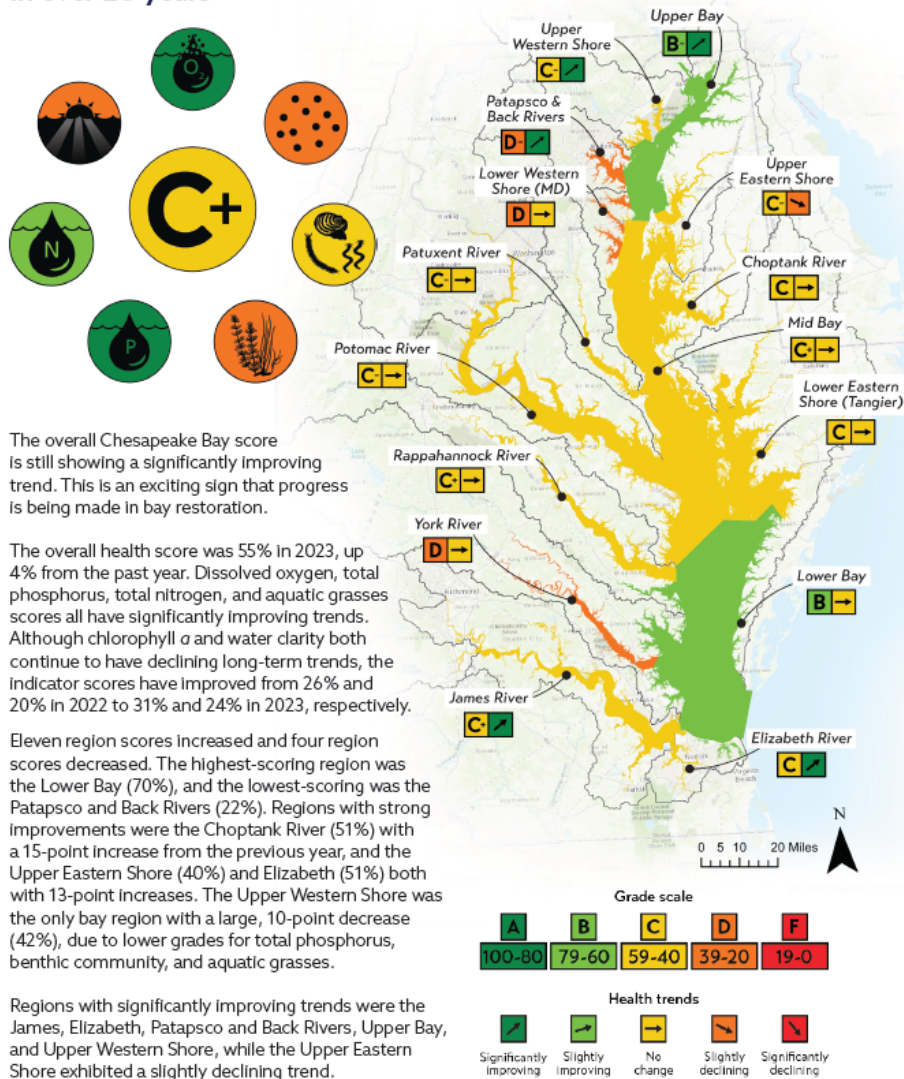
In addition to paid lobbyists, the cruise sector has a powerful trade organization, Cruise Lines International Association (CLIA), which promotes the industry and shapes messaging around “environmental sustainability”, highlighting use of liquid natural gas (LNG) and shore power which are barely used by most cruise ships and not the panacea CLIA claims them to be. For example, LNG contains methane, a greenhouse gas, which the [EPA](#) states “is more than 28 times as potent as carbon dioxide at trapping heat in the atmosphere.” According to the [International Council on Clean Transportation](#), methane emissions, or “methane slip” from LNG-fueled ships have more than doubled in recent years. The cautionary topics in this paper are not part of the industry and CLIA’s message.

Environmental Impacts

The State of Virginia Waters

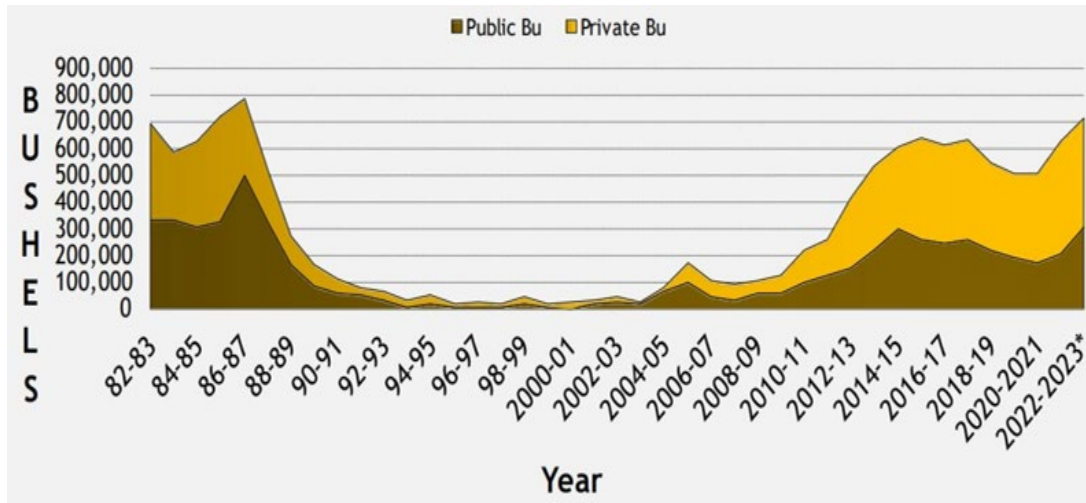
The 2023/2024 University of Maryland's [Chesapeake Bay & Watershed report card](#) shows some improvement from previous years, but many rivers and estuaries still have failing grades. Pollution from cruise ships could potentially reverse the progress that has been made toward a cleaner Chesapeake Bay.

The Chesapeake Bay has improved to C+ for the first time in over 20 years



Chesapeake Bay & Watershed Report

The oyster harvest in Virginia has also improved after years of restoration, according to the Virginia Marine Resources Commission.



Virginia Oyster Production

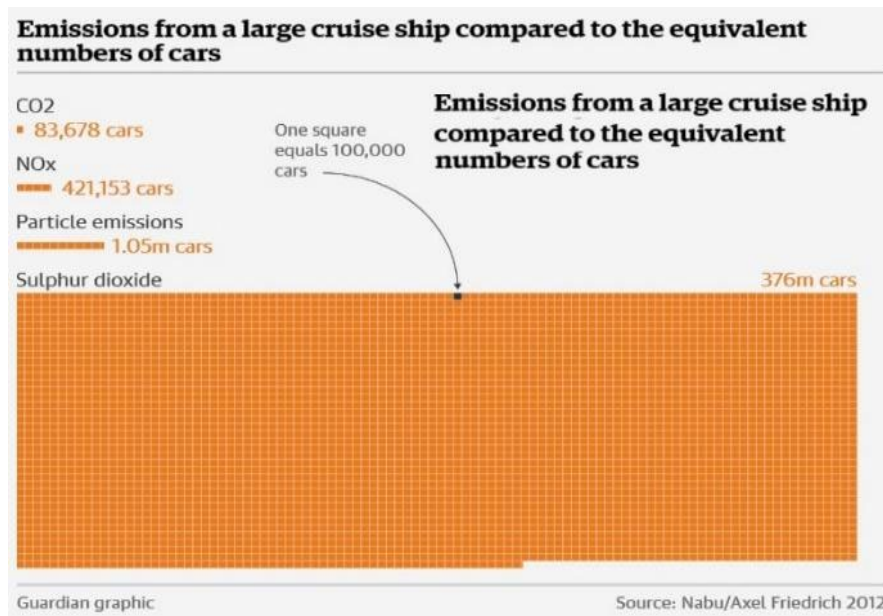
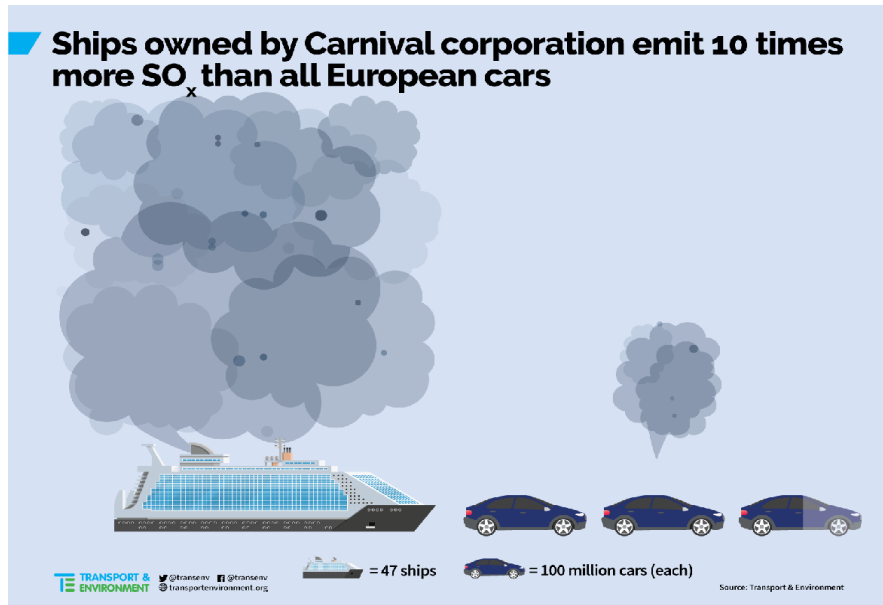
The Virginia seafood industry thrives when our waters are clean and productive. Seafood is a renewable resource, but only if the Commonwealth continues to protect the health of the bay, rivers, and estuaries.

Cruise Ship Pollution

In 2000, cruise ships carried about 7 million passengers; now that number is nearly 29 million. Like any business, cruise companies strive to increase profit and growth through market expansion. If expansion proceeds in a transparent, environmentally sustainable manner, such growth can benefit host communities. But it seems that, more often than not, the industry is willing to trade pollution for profit.

Most cruise ships use a very dirty grade of so called “bunker fuel,” or Heavy Fuel Oil (HFO) a tarry sludge left over from the crude oil refining process. Emissions of toxic sulphur and nitrogen oxides (SO_x and NO_x) from the burning of this low-grade high-sulphur fuel is an ongoing serious threat with “[consequences for the atmosphere, the marine environment, and human health](#),” and an acute spill of HFO would be disastrous as well.

From a 2019 report, [One Corporation to Pollute Them All](#), the quantity of SO_x produced by cruise ships is depicted below compared to the output from all the cars in Europe. Emissions also include toxic particulate matter (soot) and CO₂.

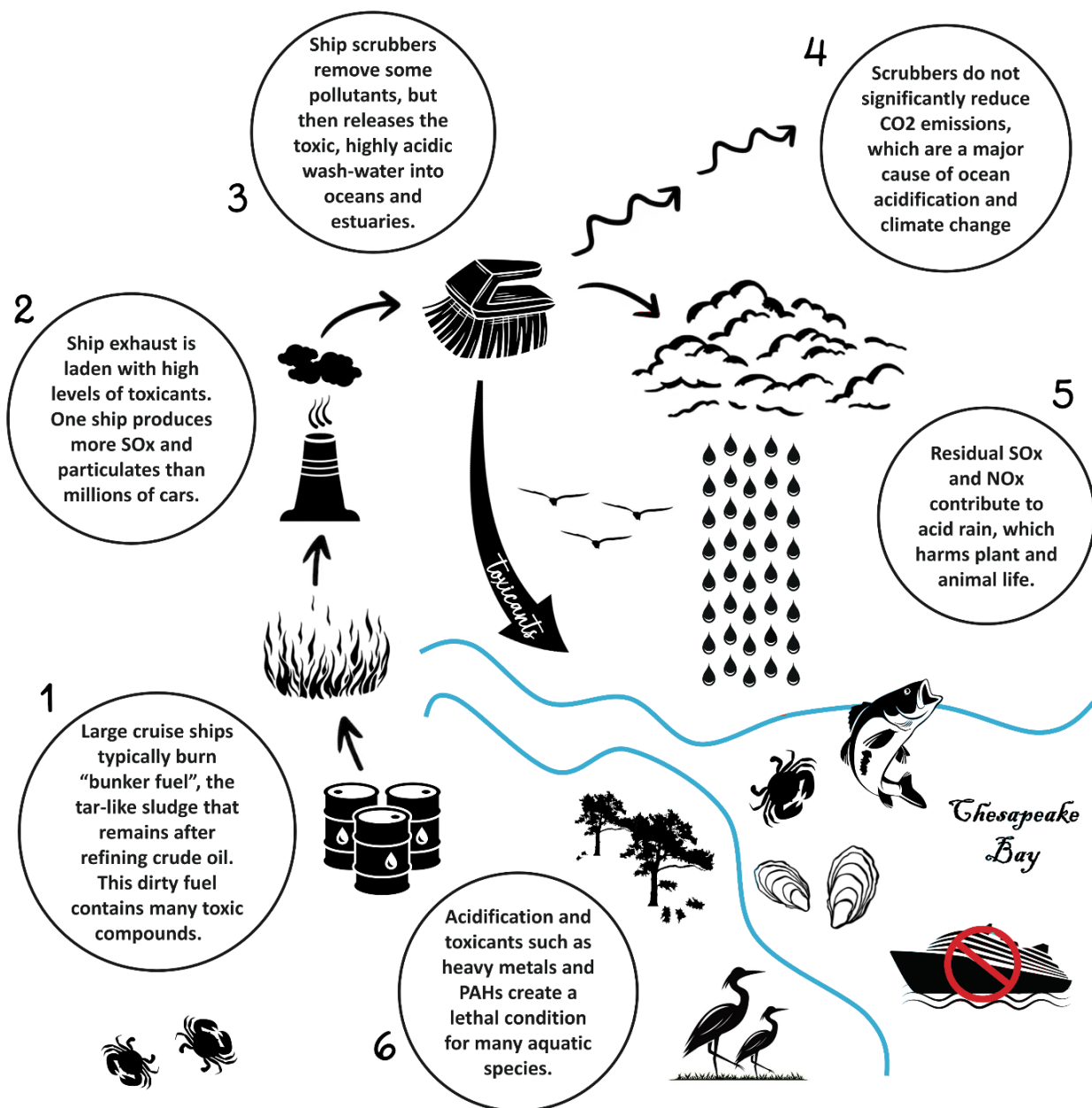


Cruise Ship Emissions

In 2020, the IMO (International Maritime Organization) set new tougher standards for sulphur emissions, and currently the global shipping fleet is in the process of switching to lighter, cleaner fuels. But the environmental effects of these regulations are offset by increases in ship size and numbers over time, and by the loophole allowing vessels to reduce sulphur by using scrubbers, or Exhaust Gas Cleaning Systems. The cruise industry has elected to use scrubbers rather than switch to more expensive fuels to “greenwash” the problem while saving money. (see: [Shipping’s dirty secret: how ‘scrubbers’ clean the air – while contaminating the sea](#)).

The types of scrubbers used by most cruise ships are open-loop systems and do not solve the pollution problem. These systems use ambient seawater sprayed into exhaust stacks to remove pollutants, but the highly acidic spray, laden with toxic PAHs and heavy metals, is then simply flushed back into the water.

Scrubbers thereby transfer an air pollution problem into a water pollution problem. The decision to continue burning HFO's clearly illustrates the industry's disregard for the environment in favor of higher profits. The [International Council on Clean Transportation](#) states that, scrubbers are not as effective at reducing total air pollution compared to marine gas oil and scrubber discharge "contributes to ocean acidification and worsens water quality." In response, many countries have banned scrubbers. An article by [Liqtech Int.](#) states that, "more than 120 ports worldwide have banned open-loop scrubber discharge", yet Virginia has no restrictions.



Cruise Ship Pollution from Burning Bunker Fuel

Heavy metals can have a devastating effect on zooplankton which cod, herring, and other species feed on. Polycyclic aromatic hydrocarbons (PAHs) have been linked to several types of cancers and reproductive dysfunction in marine mammals, including southern resident orca in the north Pacific and beluga whales.



Toxicants released by open-loop scrubbers

CO₂, a greenhouse gas, is also released by cruise ships. As one [source](#) states, the CO₂ output from one ship is equivalent to more than 83,000 cars. Another [source](#) states, “just one cruise ship docked for a day at port can emit diesel exhaust equivalent to 34,400 idling trucks.” Increasing atmospheric CO₂ is the major cause of global climate change and ocean acidification. Climate change is impacting Virginia in multiple ways: increased storm intensity/frequency, heat waves and drought, and sea level rise. [Tangier Island](#) may be under water within the next 50 years. Coastal military bases will be impacted. A [Military Times article](#) warns, “the Department of Defense says two-thirds of the bases are vulnerable to worsening flooding as the climate warms, and half are vulnerable to increasing drought and wildfires.” [Homeowners’ coastal properties in Virginia](#) are already seeing the impact of extreme weather in their insurance premiums, and “climate exceptions” in their policies.

Ocean and coastal acidification is a global challenge causing harm to marine life, primarily affecting the ability to form shells and skeletons. Coral reefs and shellfish such as oysters are highly susceptible to acidification, and this [video](#) from a public meeting in Yorktown, Virginia succinctly states the risk to the oyster industry if cruise ships are allowed to expand operations in Virginia waters.

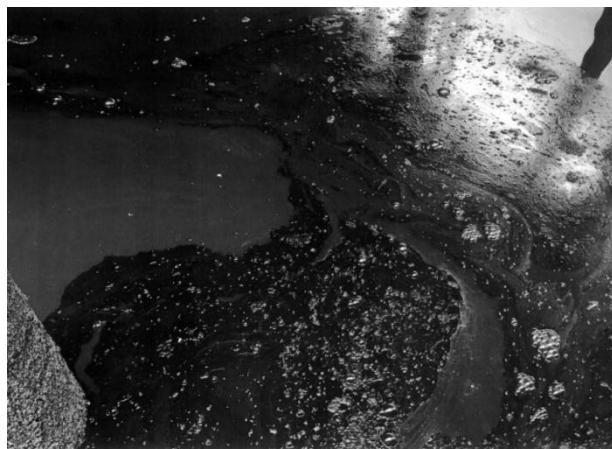
Pollution from waste discharges on cruise ships is also a major problem. A 2008 report by the [Congressional Research Service](#) estimated that during an average weeklong cruise, a cruise ship carrying 3,000 passengers and crew can generate 210,000 gallons of raw sewage; 1 million gallons of gray water (from sinks, showers, and washing machines); 130 gallons of hazardous materials; up to 8 tons of solid waste; and 25,000 gallons of oily water. Effluent waste can contain bacterial and viral pathogens and

also high nutrient concentrations which promote algal blooms and cause oxygen-depleted “dead zones.” The Bureau of Transportation Statistics’ summary of the waste streams can be found [here](#).

Another little-known problem is the noise of the ships' machinery, which can be heard by whales up to an hour before ships arrive. This noise interferes with their communication and location capabilities, and therefore impacts foraging and reproductive success.

Accidents and Violations

The “normal” or operational pollution generated by the cruise industry is significant by any measure and the damage to our environment is still being assessed. In addition, accidents do occur and have significant and direct impacts on local ecosystems and port communities. Many incidents are minor, but serious ones can be devastating. In November 2023 a Carnival cruise ship dumped scrubber sludge into Grand Turk port waters during a power outage. Another scrubber accident in a port in Ketchikan, Alaska, is shown to the right. Other accidents include fires and damage to pier facilities during bad weather.



Release of Scrubber Sludge [\[source\]](#)

The cruise industry has a history of pollution and felony convictions for violating environmental regulations. In 2016, Princess Cruise Lines paid the [largest criminal penalty](#) for deliberate vessel pollution, \$40 million dollars. They used a surreptitious “[magic pipe](#),” to bypass the oily water separator, which allowed waste liquids to be discharged in contravention of maritime pollution regulations. This violation occurred on multiple ships, pointing to a systemic issue with the industry. Furthermore, even after the large fine, Princess [continued to violate regulations](#) six times and received an additional \$20M fine in 2022. A history of some of the major cruise ship violations can be found [here](#).

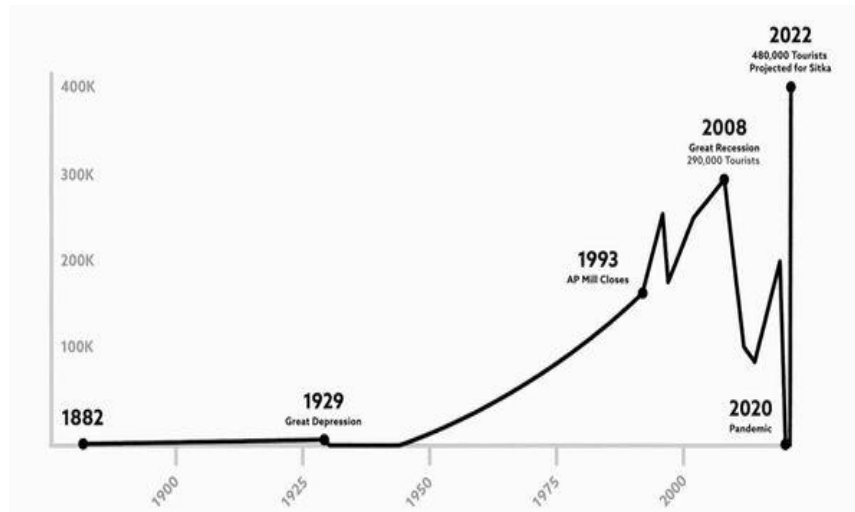
In addition to pollution spills, another all-too-frequent accident is whale strikes. In May 2024 a cruise ship sailed into New York Harbor with a 44-foot dead endangered sei whale across its bow. A video of the incident is [here](#). The noise from the cruise ships confuses the whales and disrupts their communications. Also this year, eight whales of four species, including the endangered Atlantic Right Whale, washed up in [southeastern Virginia and Northeastern North Carolina](#). It is thought that several of these deaths were likely from vessel strikes.

Community Impacts

Key West, Charleston, Venice, Barcelona, Sitka, Juneau, Seattle, Amsterdam, Monterey Bay, Marseille, Bar Harbor, Bergen, and many other cities all tell the same tragic story. The cruise industry has exploited these communities to the breaking point, and yet the citizens in these communities have had little input in the initial decision to bring in large cruise ships. Now they are fighting back.

Sitka, a remote community in Alaska, now has over 560,000 tourists per year (see the following graph). Sitka’s story is depicted in the documentary “Cruise Boom”, excerpts of which can be found [here](#). The citizens voted down a cruise ship pier and the cruise lines side-stepped the community by helping to

finance a business for a privately run pier; this also happened in Key West. In a recent Sitka survey, 63% of respondents said the cruise industry negatively impacted their lives. Despite a clear message from residents, the industry places profits before the will of the people. Bar Harbor, Maine, recently passed a law limiting tourism to 1,000 passengers per day and have been fighting [costly court challenges](#). There are growing numbers of such stories worldwide.



Graph of Cruise Industry Over-Tourism in Sitka, Alaska

In Yorktown, Virginia, the cruise industry lobbied local government and legislators outside of the public eye to secure funding for a cruise ship pier on private property (the non-profit Watermen's Museum). After finding out from local media outlets, residents fought back through town educational meetings, a [website](#), and a [petition](#). A resident from Juneau, Alaska read about the effort to stop Princess Cruise Lines from coming to Yorktown and wrote a letter that in part stated,

"You are in a critical moment, and I am encouraged to see you organizing so quickly. The industry are colonizers, and they go through stages in their colonization and exploitation. I think you could be in the position to be assertive and in their face and turn them away. If they start coming, they will get locals who sell out and every local who gets money from them will make it harder to stop."

"They promise the sun and the moon. They will externalize all costs, make demands that have you giving up what is dear to you, and frame a lot of 'facts' that are not facts."

A concerned woman from Charleston, North Carolina, shared her experience in a heart-felt letter to the York County Board of Supervisors as well:

"Over the years, the cruise ship industry touted economic benefits of cruise traffic, while downplaying the harmful consequences. The boats pollute our air, create effective no-go zones for residents, and tax city infrastructure and public services. All a very sugar-coated, hidden agenda."

The story in each port city is remarkably similar. The cruise industry's tactic is to work behind the scenes promising economic benefits while downplaying negative impacts. They work to get a foot in the door

with local businesses and organizations, asking to start small, maybe with a pilot program. They will lobby local and state officials promoting their agenda, outside of the public eye if possible, and contribute to their campaigns. Once a program is initiated, they make it difficult to back out. Businesses are pitted against citizens, allowing cruise lines to continue to operate and expand. Over time a majority of residents organize and push back but it is costly and difficult to unseat this multibillion-dollar industry once it moves into an area. The cases are well documented in articles and reports. An article from the [Business Insider](#) tells the story of these port communities through images.

Conclusion

A key aspect of this paper is to assert that a decision on cruise ship gambling in Virginia is part of a much broader issue regarding cruise ship regulations in general. The industry has stated that there will be little impact to communities in Virginia and economic benefits due to gambling. But an alternate perspective is that, in addition to the harms of gambling and the very real difficulties of regulating these activities on ships, approval of cruise ship gambling will greatly incentivize this industry in coastal Virginia. Based on well-documented evidence, it is very clear that this industry should not be allowed to expand in Virginia without appropriate safeguards to protect the Commonwealth's citizens, our port communities, and our fragile ecosystems. The Chesapeake Bay is one of the largest and most productive estuaries in the world, and its improving health depends on good stewardship by bordering states. Virginia must carefully consider the concerns detailed here.

The concerns outlined in this document include:

- The negative impacts of gambling
- The industry's poor track record of self-regulation
- The issues with foreign-flagged ships
- Inflated economic benefits never realized
- Lack of transparency and suspect business practices
- A dismal environmental record of both air and water pollution
- A history of criminal violations and accidents
- The character-altering effects on port communities due to over-tourism.

For these reasons, [Protect Virginia](#) believes approval of cruise ship gambling, without a holistic strategy to protect the Commonwealth and its citizens from the harmful impacts of this industry, would be irresponsible or, at the very least, premature. We urge you to recommend a Joint Legislative Audit and Review Commission (JLARC) study to ensure proper legislative oversight and accountability for cruise ship gaming.

Thank you for your consideration.

Protect Virginia Steering Committee

Protect Virginia Steering Committee:

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