

LINKS BETWEEN OVERSEAS AND AUSTRALIAN TOBACCO INDUSTRY GROUPS: CHART 2

Summary of argument

- For three decades international tobacco companies disputed the medical evidence that smoking causes serious diseases
- Internal documents from the tobacco industry disclose that in 1977 seven of the world's major tobacco companies conspired to promote a global "controversy" over smoking and disease, in an exercise called "Operation Berkshire"
- This conspiracy resulted in the International Committee on Smoking Issues (ICOSI) which operated through an internationally coordinated network of national manufacturers' associations, including in Australia, to deny the medical evidence and retard measures for tobacco control
- Australian tobacco companies and the TIA collaborated with their associated overseas groups including ICOSI/INFOTAB.

1976	
<i>BAT concerned about Australia and the US and calls for an agreed action plan</i>	<i>8 September 1976: In a BAT memo from R. Haddon "It is clear...that in the USA and Australia, in particular, and to a less extent in Canada...the Industry needs to agree a course of action and to implement it as soon as possible..."¹.</i>
<i>Meeting of several international companies to develop a unified defensive strategy on smoking</i>	<i>3 December 1976: Hugh Cullman (President, Philip Morris International) received a telephone call from the Chairman of Imperial Tobacco in the United Kingdom, Mr A G (Tony) Garrett, who proposed a meeting of the world's major tobacco companies to develop a unified "defensive strategy" on smoking issues. A Philip Morris memorandum records: Tony Garrett (TG) Chairman of Imperial Tobacco Limited phoned me from London. TG informed me that he had been exploring with a number of major tobacco companies; specifically, B.A.T., R.J. Reynolds, Reemtsma, Rothmans International and now with Philip Morris International, whether we might be prepared to meet discreetly to develop a defensive smoking and health strategy for major markets such as the U.K., Germany, Canada, U.S. and possibly others. TG reported that B.A.T., R.J. Reynolds, Reemtsma, Rothmans International and Imperial Tobacco were prepared to consider such a program which TG suggested take place after careful preparation in April or May of 1977 . . . The meeting would be as discreet as possible with, hopefully no publicity emanating therefrom, with a public affairs statement ready should news of such a meeting leak out. The initial objective of this group was to develop a smoking and health strategy which would include a voluntary agreement that no concessions beyond a certain point would be voluntarily made by the members and if further concessions were required by respective governments, that these not be agreed to and that governments be forced to legislate. TG seemed to be most concerned that companies and countries would be picked off one by one and that the Domino theory would impact on all of us².</i>
<i>Secret strategy code named "Operation Berkshire"</i>	<i>3 December 1976: Garrett followed up the conversation with a letter outlining the proposal under the code name "Operation Berkshire." He noted that he had received support for the idea from British-American Tobacco, R J Reynolds, Reemtsma, and Rothmans International and proposed the meeting could be held at Shockerwick House, near Bath, England.³ Imperial Tobacco wrote to prospective attendees on 24 March 1977 outlining the programme and enclosing a bogus press statement.^{4 5}</i>
1977	
<i>Several Chairmen participate</i>	<i>24 March 1977: Letter from A.G. Garrett of Imperial Tobacco to Alexander Holtzman of Philip Morris Int. confirming list of several Chairmen to attend "Operation Berkshire" meeting on 2 June⁶.</i>

<p><i>Including Andrew Whist, Director Philip Morris (Australia)</i></p>	<p><i>14 April 1977: Letter from H Cullman (PMI) to R.A Garrett notifying of attendance Mr A. Whist, Director of Corporate Affairs, Philip Morris (Australia) Ltd at "Operation Berkshire"⁷.</i></p>
<p><i>Joint position paper on "continuing controversy"</i></p> <p><i>Fear of liability a major motivation</i></p>	<p><i>15 April 1977: A position paper jointly prepared by British-American Tobacco and Philip Morris was circulated under cover of a letter stressing "the need for confidentiality and security" as neither company "would wish the paper to fall into the wrong hands." This paper proceeded on the assumption of "a continuing smoking and health controversy," involved a refusal to "accept as proven that there is a causal relationship between smoking and various diseases," and maintained that "the issue of causation remains controversial and unresolved."^{8 9} It seems that a major motivation was fear of legal liability, particularly in the United States.¹⁰</i></p>
<p><i>Rehearsed other positions</i></p>	<p><i>Despite this, industry documents from around the time disclose that senior officials within the industry took a different view.¹¹ This view differed to such an extent that by 1980 documents from British-American Tobacco rehearsed "possible positions on smoking and health"¹² and canvassed "a new company approach to the smoking and health issue."¹³</i></p>
<p><i>Objectives of the conspiracy</i></p>	<p><i>The agenda for Operation Berkshire included determining areas for future cooperation in matters relating to smoking and health, discussing the feasibility of joint industry research into the benefits of smoking, and mounting a programme of "smoker reassurance" to counter the increasing social unacceptability of smoking.^{14 15} Proceedings from the meeting on 2 and 3 June 1977 are recorded in a minute apparently prepared by a representative of Philip Morris Europe.¹⁶ The minute, headed "strictly confidential limited circulation," describes a presentation by Imperial Tobacco, which "by implication rather than direct admission, made concessions in the areas of Lung Cancer, Pregnancy and to a lesser extent, Coronary Heart Disease." This was followed by a "full discussion" of the Philip Morris and British-American Tobacco position paper and the ready acceptance of a "parallel paper" tabled by R J Reynolds.</i></p>
<p><i>Working parties on smoking benefits and social acceptability</i></p>	<p><i>The record by Philip Morris of the meeting notes an agreement to establish three working parties dealing with the social acceptability of smoking, the benefits of smoking, and "other possible causes of alleged smoking related diseases." It recommended:</i></p> <p><i>"That Philip Morris regards Operation Berkshire as a turning point in international cooperation on a matter of vital concern to the industry</i></p> <p><i>That Philip Morris attempts to maximise the effectiveness of the three established working committees by including executives with experience beyond purely the scientific or legal disciplines</i></p>

	<p><i>That full security cover be maintained for future meetings irrespective of numbers of executives involved</i></p> <p><i>That the agreed position paper becomes the vehicle to activate industry associations throughout the world.</i></p> <p><i>In time, this group of international executives from the tobacco industry became known as the International Committee on Smoking Issues.</i>^{17 18}</p>
<p><i>Implementation of the conspiracy</i></p> <p><i>Almost came to a deadlock over causality</i></p>	<p><i>21/22 July 1977: After the meeting, the working parties set about their tasks. A memorandum from Helmut Gaisch, the delegate for Philip Morris Europe, summarised a working party meeting on medical research follows:</i></p> <p><i>At the beginning of the meeting we almost came to a deadlock. In discussing causality, a complete division of opinion occurred: Drs. Bentley, Field and Felton on the one side and Dr. Colby and myself on the other with Dr. Melch and Mr Hatchett remaining indifferent. The reason was that the three representatives of the British companies accepted that smoking was the direct cause of a number of diseases. They shared the opinion held by the British medical establishment that a consistent statistical association between one risk factor and a disease was sufficient to be able to assume causality. Dr. Colby and I emphasised, however, that the existence of a statistical association between a number of disease categories with a wide range of variables (risk markers or risk factors) many of which have not even been recorded with sufficient accuracy can, on principle, not serve to establish causality.</i>¹⁹</p>
<p><i>Taskforce program devised</i></p> <p><i>Industry policies to be implemented through national Associations</i></p>	<p><i>11/12 November 1977: A second meeting of the International Committee on Smoking Issues was held at Brillancourt, Lausanne, Switzerland where: a revised position paper was adopted, working parties' reports received, and a "task force program" devised.²⁰ One resolution involved an acceptance of the need for fully supported national associations of cigarette manufacturers such as tobacco institutes. This also involved the expression of the belief "that the Industry's activities in the smoking and health field should be carried out by or through the Associations, whenever this is appropriate." In 1978, a secretariat was established in Brussels for the International Committee on Smoking Issues and a charter was ratified at a meeting at Leeds Castle.^{21 22 23} Task forces were also established to monitor world conferences on smoking and health.²⁴</i></p>
1978	
<p><i>ICOSI evolved into INFOTAB</i></p>	<p><i>1 December 1978: INFOTAB formerly known as ICOSI was established to provide "a forum for exchange of views and information on international tobacco issues (to include tobacco and health)..” The founding members were BAT, Imperial Tobacco, Philip Morris, Reemtsma, RJ Reynolds and Rothmans Int. Membership was open to national manufacturers associations and manufacturers of tobacco products.</i>²⁵</p>

<p><i>Tobacco Institute of Australia formed in 1978</i></p>	<p><i>The International Committee on Smoking Issues and International Tobacco Information Centre fostered the establishment of the national manufacturers' associations, and a joint meeting of these associations was convened in Zurich, 20-3 May 1979.²⁶ One of the first countries to establish a national manufacturers' association was Australia, where the Tobacco Institute of Australia was established in December 1978. By 1981 there were 28 national manufacturers' associations in North America, Europe, Australia, New Zealand, Africa, the Middle East, Latin America, and the Far East including the Indian subcontinent.²⁷</i></p>
1979	
<p><i>TIA chief attends joint meeting of companies and manufacturers' associations</i></p>	<p><i>May 1979: Mr B. Simpson from the Tobacco Institute of Australia²⁸ attended an ICOSI gathering in Zurich of 60 delegates from tobacco companies and national manufacturers' associations world-wide for presentations on smoking policies and role of ICOSI.</i></p>
1980	
<p><i>Consideration given to "coming clean" on causal issue</i></p>	<p><i>Discussion within the industry dating back at least 40 years shows that it had long contemplated "coming clean" on the causal issue, at least for heavy smokers. A British American Tobacco document dated 16 May 1980 states:</i></p> <p style="padding-left: 40px;"><i>The company's position on causation is simply not believed by the overwhelming majority of independent observers, scientists and doctors . . . The industry is unable to argue satisfactorily for its own continued existence, because all arguments eventually lead back to the primary issue of causation, and on this point our position is unacceptable . . . our position on causation, which we have maintained for some twenty years in order to defend our industry is in danger of becoming the very factor which inhibits our long term viability.</i></p> <p><i>This document discusses the disadvantages and advantages of making admissions on the causal issue, and concludes [to] "continue to maintain our present position on causation" or:</i></p> <p style="padding-left: 40px;"><i>we can move our position on causation to one which acknowledges the probability that smoking is harmful to a small percentage of heavy smokers . . . On balance, it is the opinion of this department that . . . we should now move to position B, namely, that we acknowledge 'the probability that smoking is harmful to a small percentage of heavy smokers' . . . The ideas suggested above are in some cases a radical departure from our current practice although nearly all of them have echoes in our overall policy and attitudes. The problem to date has been the severe constraint of the American legal position. This problem has made us seem to lack credibility in the eyes of the ordinary man in the street.</i></p>

	<i>Somehow we must regain this credibility. By giving a little we may gain a lot. By giving nothing we stand to lose everything³⁰.</i>
1981	
<i>Joint action plan of INFOTAB, manufacturers association and Philip Morris</i>	<i>20 January 1981: J M Hartogh, Philip Morris sends an inter office memo to M Murray regarding An "Action Plan to make INFOTAB/NMAs/PM work more effectively in confronting the Smoking and Health Issue". Australia is mentioned as having one of a few NMAs not lagging behind. Strategies to improve effectiveness include that the industry establish local delivery systems "through which it can act, communicate and pass its messages".³¹</i>
<i>"Operation Mayfly" a longer term strategy to change public opinion</i>	<i>"Operation Mayfly" was conceived by the International Tobacco Information Centre, as a "long term communications plan" in response to the World Health Organization's campaign "Smoking or health the choice is yours."³² Operation Mayfly involved a 1981 "field test" utilising the tobacco institutes of Australia and New Zealand ". . . to influence, modify or change public opinion to the industry, smokers and smoking, to create a more favourable climate however directly or indirectly."³³</i>
<i>Boards of individual companies get to agree on areas of common ground</i>	<i>8 October 1981: L Blackman (BAT) sends a telex to Dr H Gaisch, Director of R&D, PM Europe regarding "suggested areas of common ground re isc proposed outline of third report (doc/ta614)." The areas include reduction in 'tar' yields, monitoring health risks and components other than tar, and are prefaced by: "I stress that the boards of individual companies have not agreed the items, but we, the research directors, feel firm on the subject" ³⁴³⁵.</i>
<i>Research directors from different companies discuss policies to develop industry position</i>	<i>14 October 1981: Dr H Gaisch (PM Europe) in a letter to Hugh Cullman, Chairman of PM USA seeks advice on industry policy, smoking and health. Dr Gaisch refer to previous meetings on policies with research directors of the British Industry and conversations that Dr Blackman of BAT claims he had with Cullman, the PM USA Chairman. Dr Gaisch refers to the concerns of others, such as Dr Stern of Gallaher Ltd, Dr Williams of Carreras-Rothmans³⁶.</i>
<i>Collaborative effort produces how to approach government & medical authorities</i>	<i>18 November 1981: Dr L Blackman (BAT) in a letter to Mr A Holtzman (PMI) refers to slides relating to a new stance that he left with Holtzman at an INFOTAB meeting. One of the slides on "Basic approach to government and medical authorities" was modified by BAT in light of further discussions with B&W and BATCo lawyers ³⁷.</i>
1982	
<i>Philip Morris asks Rothmans to lobby government on its behalf</i>	<i>30 June 1982: John O'Brien of Philip Morris Australia send a memo on Barclay (brand of cigarettes) to K. Baxter and G Bible (PMI) following a telephone conversation with Bill Ryan of Rothmans Australia. Collaboration between the three tobacco companies is discussed including benefits of a joint approach to government. O'Brien (PMA) asks Rothmans to lobby government</i>

	<i>on their behalf to adopt the Philip Morris smoking machine adaptors</i> ³⁸ .
1984	
<i>Rothmans Group requests inclusion in scientific discussion group</i>	<i>21 June 1984: In an INFOTAB memo from Bryan Simpson (Sec Gen) sent to researchers at Philip Morris, Imperial and Rothmans, further meetings are referred to for discussing research areas. "The Rothmans Group" has requested "to be included in the scientific discussion group".</i> ³⁹
<i>Several companies represented on Passive Smoking committee</i>	<i>27 June 1984: Passive Smoking Committee formed with members from several companies, INFOTAB and legal advisers. Richard Corner from INFOTAB in a letter to Dr R.E. Thornton (BAT) invite him to join a scientific group looking at passive smoking.</i> ⁴⁰
<i>And a "Pooling of Research" working party</i>	<i>31 July 1984: H.B. Grice from the Tobacco Advisory Council (UK) in a letter to representatives of BAT, Imperial Tobacco, Gallaher, Philip Morris and Rothmans (UK) refers to pooling of research, a Pooling Agreement and a request for names for a working party.</i> ⁴¹
1987	
<i>Former head of Amatil, Australia presents at conference on tobacco</i>	<i>4 June 1987: Australian representative from Amatil, Mr Dean Wills attends a global conference with several members of tobacco companies and presents a review of the tobacco growth and challenges in Australia.</i> ⁴²
<i>BAT issues guidelines for Amatil on tobacco</i>	<i>20 July 1987: BAT Industries issues guidelines for Amatil on tobacco operation in Australia including making full use of product and processes elsewhere within the BAT Industries Group</i> ⁴³ .
1988	
<i>Philip Morris executives in Australia receive orders from Philip Morris International</i>	<i>13 December 1988: Philip Morris executives in Australia receive directions from Geoff Bible, (President PMI) for implementing an action plan that they discussed at an earlier conference in Boca Raton. In Bible's "confidential" covering letter, he attaches a distribution list to 28 executives world-wide including J. King and P Francis under heading Australia. The action plan is a directive outlining corporate problems, allocating responsibility and deadlines for completion. "I have now finalised the listing of various topics...and have agreed the responsibilities, timing etc. I am anxious that we meet all deadlines and I therefore urge you to give the attached your full and prompt attention"</i> ⁴⁴ .
1991	
<i>Wills (Aust) advises industry about its position on smoking after approval by BATCo</i>	<i>20 September 1991: George Symmes (Wills Aust) advises industry members Ken Pimblett (TIA), Peter Alexander (Rothmans Pall Mall) and Phil Francis (Philip Morris Aust) that BATCo has approved their position on smoking. That is, "In our opinion science has not established that smoking causes disease and it is our view that further scientific research is necessary to address a number of inconsistencies in the statistical and biological evidence"</i> ⁴⁵ .
1992	

<i>Rothmans UK advise Rothmans Aust who advise TIA on experts in AFCO case</i>	<i>11 June 1992: Marlene Critchley (Rothmans Aust) in a letter to Donna Staunton of TIA, with copies to all three Australia tobacco companies, refers to list of AFCO visiting experts “suggested by Rothmans in the UK.”⁴⁶</i>
1993	
<i>Philip Morris (Int) requests weekly reports on Australia</i>	<i>3 March 1993: Geoff Bible (President of PMI) expects weekly reports on what is happening in Australia from David Davies. Bible advises Davies in a memo on Australia about the main issues including, PM’s “corporate clout” with governments, the need to block tobacco legislative controls, how to “hob-nob” with the elite and to use the Kraft association at government levels but not publicly⁴⁷</i>
<i>Contract between RJR International company and Australian company RPM</i>	<i>4 March 1993: RJR memo to senior executives of two companies, RJReynolds and RPM (Rothmans of Pall Mall) following joint meeting to discuss distribution of RJR brands by Rothmans. Memo quotes a contract between the two and requests assistance from Rothmans with brands made and sold within Australia. “A complete set of up-to-date product specifications for RJR products made by RPM was provided during this visit”⁴⁸</i>
1994	
<i>BAT advises Wills (Aust) that statement during Waxman visit must reflect B&W position</i>	<i>26 August 1994: Dr Sharon Boyce (BAT’s smoking issues dept) is concerned about a visit to Australia by Waxman [Congressman who chaired Senate hearings] and refers to a media clip about B&W documents and “Project Truth”. Boyce directs BAT staff to urgently contact Wills Australia as any statement in response to Waxman comment must reflect B&W position⁴⁹.</i>
1995	
<i>Philip Morris (Int) directs Philip Morris (Aust)</i>	<i>27 April 1995: Several Australian Philip Morris executives and others on a list of 43, are advised by David Dangour, of Philip Morris Int. about the creation of three new taskforces to deal with the most critical challenges facing the industry: social acceptability; plain packaging; and youth access. “PMI Public Affairs will provide all the support to coordinate the meetings, draft agendas, gather meeting materials and draft conclusions”⁵⁰.</i>
1996	
<i>Rothmans Int monitors Australian data and a visit to Australia of industry consultant and ARISE member</i>	<i>18 September 1996: In a fax from Rothmans International to Marlene Critchley (Industry Affairs Manager, Rothmans Australia) David Rowland requests an update on the status of a proposed IPA Conference in Australia to be attended by John Luik [an industry paid consultant, member of ARISE who visited Australia to publicly dispute medical evidence on passive smoking]. “We are wondering whether this might be an opportunity at which the Australian personal monitoring data could be presented.”⁵¹</i>

¹ PM 2025025457-5460

² Cullman, H. (Philip Morris Int) Confidential memorandum to the files 3/12/73 www.pmdocs.com Bates No. 2025025286

³ Garrett R.A. (Imperial Tobacco) Letter to Cullman H (PMI) www.pmdocs.com Bates No. 2025025290

⁴ Garrett, R.A. (Imperial Tobacco) Letter to Holtzman A (PMI) www.pmdocs.com Bates No. 2025025341

⁵ Anon. Draft press release (undated). www.pmdocs.com Bates No. 1000213803.

⁶ Garrett RA (Imperial Tobacco) Letter to A Holtzman (Philip Morris Int) www.pmdocs.com Bates No. 2025025341

⁷ Cullman H (Philip Morris Int). Letter to Garrett RA (Imperial Tobacco). www.pmdocs.com Bates No. 1000219793

⁸ Lockhart GHS (BAT) Letter to Garrett R.A. (Imperial Tobacco). 28/4/77 www.pmdocs.com Bates No. 2501024571.

⁹ Anon. Position paper, 28/4/77 www.pmdocs.com Bates No 2501024572/4575.

¹⁰ Osdene TS. Roper study proposal to tobacco institute, 16/2/78 www.tobaccoinstitute.com Bates No 34601/4602.

¹¹ M.J.L., G.F.T. British American Tobacco. Possible positions on smoking and health. Does BAT think that smoking causes diseases such as cancer? Appendix A2;15/5/80. <http://outside.cdc.gov:8080/BASIS/ncctld/web/abindex4/sf> Bates No 109881333-4

¹² British American Tobacco, secret appreciation draft No 3, a new company approach to the smoking and health issue, 16/5/80.

¹³ <http://outside.cdc.gov:8080/BASIS/ncctld/web/abindex4/sf> Bates No 109881335

¹⁴ Anon. Operation Berkshire, 1977: Apr 15. www.pmdocs.com Bates No 2501024570

¹⁵ Anon. Operation Berkshire. Agenda papers, 30/5/77 www.pmdocs.com Bates No 2025025356

¹⁶ Anon (strictly confidential limited circulation). Brief notes on Operation Berkshire Shockerwick House, 2-3/6/77 www.pmdocs.com Bates No 2024266422/6428

¹⁷ Anon. International Committee On Smoking Issues (ICOSI) Working Party on Smoking Behaviour. Chelwood, 1-3/9/77 www.pmdocs.com Bates No 2501020219

¹⁸ Anon. Working party on the social acceptability of smoking issue. Background, objectives, and procedures, 1977. www.pmdocs.com Bates No 2025025295/5300

¹⁹ Gaisch H (Philip Morris). Letter to Wakeman HR and Fagan R (Philip Morris), 12/8/77 www.pmdocs.com Bates No 1003727234/7235

²⁰ Anon. The second ICOSI meeting, Brillancourt, Lausanne, 11/11/77 www.pmdocs.com Bates No 2501017119/7140

²¹ International Committee on Smoking Issues. Provisional job description for the secretary general and other ICOSI staff, 1978: Apr. www.pmdocs.com Bates No 2501020317/0321

²² Doyle J (secretary general International Committee on Smoking Issues). Letter to Simpson B (Tobacco Institute of Australia), 1979: Jul 12. www.pmdocs.com Bates No 2501015819

²³ Anon. Draft agenda for Leeds Castle meeting, 1978: Sept 11. www.pmdocs.com Bates No 2501020290

²⁴ Anon. ICOSI Task Force on Fourth World Conference on Smoking and Health, Kansas City Meetings, 1978: Nov 20-1. www.pmdocs.com Bates No 2501015505

²⁵ Unknown. Background Information: Enclosure 1 Guildford Depository Bates No. 109879868

²⁶ International Committee on Smoking Issues. Delegates and presenters. Joint meeting of the national associations, Zurich, 20-23/5/79 www.pmdocs.com Bates No 10040887/0893

²⁷ International Tobacco Information Centre. National Manufacturers' Associations (list). www.pmdocs.com Bates No 2025047961

²⁸ ICOSI, List of delegates. Joint meeting of national associations, Zurich 1979. www.pmdocs.com Bates No. 1000040887

²⁹ ICOSI, Agenda. Joint meeting of national associations, Zurich 1979 www.pmdocs.com Bates No. 1000040890

³⁰ Notes on group research and development conference, Sydney, 3/78 (Restricted.) outside.cdc.gov:8080/BASIS/ncctld/web/mnimages/DDW?W=DETAILSID=1249

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- ³¹ Hartogh, JM (Philip Morris) Inter-office correspondence on Action Plan to make INFOTAB/NMAs/PM work more effectively in confronting the Smoking and Health Issue www.pmdocs.com Bates No. 2501018123
- ³² King TCH (Imperial Tobacco). Letter to Stuart Alexander (Tobacco Advisory Council, London), 23/1/81 www.pmdocs.com Bates No 2025017150_7152
- ³³ Corner RM. Advisory group meeting material, 8/12/80 www.pmdocs.com Bates No 2501023924/3950; Ogilvy and Mather "Operation Mayfly 1st draft script." www.rjrdocs.com Bates No 50212 0575_0597
- ³⁴
- ³⁵ Blackman L (BAT) Telex to Dr H Gaisch (PM EEC) Suggested areas of common ground re isc proposed outline of third report www.pmdocs.com Bates No. 2501343513A/14
- ³⁶ Gaisch H (PM Europe) Letter to Hugh Cullman (Chairman PM USA) Industry policy, smoking and health www.pmdocs.com Bates No. 2501343510
- ³⁷ Blackman L (BAT) Letter to Holtzman A (PMI) and copies of slides titled Basic approach to government and medical authorities www.pmdocs.com 2024954637/39
- ³⁸ O'Brien, J Report of a telephone call to W. Ryan – Rothmans (Aust) ltd – June 23 www.pmdocs.com Bates No. 2024257592/3
- ³⁹ Simpson, B 21/6/84 INFOTAB memo Guildford Depository Bates No. 103546263
- ⁴⁰ Corner, R. 27/6/84 Letter to Dr Thornton Guildford Depository Bates No. 103546252/3
- ⁴¹ Grice, HB 31/7/84 (Tobacco Advisory Council) Letter to BAT, Imperial, PM Rothmans, Gallagher Guildford Depository Bates No. 100430393
- ⁴² Unknown. 4/6/87 CAC X: London - Conference Notes Guildford Depository Bates No. 201767361/85.
- ⁴³ BAT Industries, 20/7/87. Guidelines for Amatil: July 1987 Guilford 201791820
- ⁴⁴ Bible G (Philip Morris Int). Memo to distribution list www.pmdocs.com Bates No. 2021596422
- ⁴⁵ Symmes, G (Wills Aust) memo to TIA and cc to Rothmans, Philip Morris. Primary Smoking Position www.pmdocs.com Bates No. 2504079075
- ⁴⁶ Critchley, M (Rothmans Aust) 11/6/92. Visiting experts – AFCO www.pmdocs.com Bates No. 2504075784
- ⁴⁷ Bible G (PMI) 3/3/93 Inter office correspondence to D Davies. Australia www.pmdocs.com Bates No. 2047896065/71
- ⁴⁸ RJR 51641 3407
- ⁴⁹ Boyce, S 26/8/94. Fax to K Wells. Waxman in Australia. TIMN 0032157
- ⁵⁰ Dangour, D (PMI) Inter-Office correspondence to Distribution list. www.pmdocs.com Bates No. 2501241447
- ⁵¹ Rowland, D Rothmans Int internal memo to M Critchley. 18/9/96 IPA Conference www.pmdocs.com Bates No. 2063589980