Appendix A (transcript of original court document)

PROPOSAL FOR THE ORGANISATION OF THE WHITECOAT PROJECT

SUMMARY OF THE WHITECOAT PROJECT

The Project is designed to support market-level ETS programmes within the PM EEMA and EEC markets. The Objectives of these overall ETS programmes are defined as:-

End Goals:

- Resist and roll back smoking restrictions.

- Restore smoker confidence.

Pre-requisites:

- Reverse scientific and popular misconception that

ETS is harmful.

- Restore social acceptability of smoking.

Within this overall ETS context the Whitecoat Project comprises two elements:-

Pro-active element: a) To generate a body of scientific and technical knowledge in the field of ETS within the PM EEMA and EEC markets. The Project's activities and programmes will include fundamental research, IAQ and IFAQ studies. These will be undertaken by whitecoats, contract laboratories and commercial organisations such as ACVA.

> b) To disseminate and exploit such knowledge within specific communication programmes in these markets.

Reactive element:

To provide scientific and technical resources to challenge existing laws; to counter specific legislative and regulatory threats; and to respond to scientific mis-information and bias as it arises in these markets.

It is a self-standing Project initially led by PM, but will recruit as many member companies and NMA's as possible operating within the respective markets.

It will be independent from, but work cooperatively with, bodies such as INFOTAB and the US CIAR (Center for Indoor Air Research).

A priority for the Project is to address product liability concerns in all international markets, including the US.