

Rolling Tobacco

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1.0 INTRODUCTION

Manufactured cigarettes remain the most popular form of tobacco in the UK. However, demand for rolling tobacco has steadily increased in popularity in recent years (Key Note 2002). It has been suggested that many smokers trade down from manufactured cigarettes to rolling tobacco due to its cheaper price.

In the UK, around three-quarters of rolling tobacco consumption results from illegal sales. Smuggling is problematic for many reasons: it reduces the high street price of tobacco; it increases the demand for tobacco; and it undermines tobacco taxation policies resulting in adverse health consequences due to tobacco use (ASH 2002). ASH (2003) argues that tobacco manufactures benefit from smuggling in four ways:

- they are still paid for cigarettes which are later smuggled
- smuggling ensures a supply of cheap cigarettes which help keep wavering smokers addicted
- any smuggled cigarettes which are seized by customs need to be replaced in order to meet the demand for the product, thus meaning that the tobacco companies earn profits twice on seized cigarettes, and most importantly,
- it allows them to argue for reduced taxation (and therefore increases consumption) in the legal market.

It has been alleged that tobacco companies may be involved in supporting such smuggling activities.

Furthermore, evidence exits suggesting that rolling tobacco has higher tar and nicotine levels as, unlike manufactured cigarettes, these are not regulated by Community Directives (Joossens 1996). Added to this, the majority of rolling tobacco smokers do not use a filter, which means they inhale more tar, nicotine and carbon monoxide (Joossens 1996)

In 1999 the House of Commons Health Select Committee obtained access to the internal documents of five main advertising agencies of the UK tobacco industry. The five agencies were: CDP, M&C Saatchi, Mustoe Merriman Herring and Levy, TBWA GCT Simon Palmer Limited and Lowe Howard-Spink. A range of documents were obtained including: contact reports between client and agency, client briefs, creative briefs, media briefs, media schedules, advertising budgets and market research reports (their own and other contracted agencies). These documents were scanned during the summer of 2002 at the Centre for Tobacco Control Research to develop an searchable electronic (http://www.tobaccopapers.com). This site was searched using the keyword 'roll* tobacco' yielding 49 results (By using * the search engine matches up to four letter, for example, rolling, rolled and so on). All of these documents were briefly reviewed online to determine their significance and those relevant were printed out for review.

The documents demonstrate that:

- 1. Consumer research is conducted to explore motivations for smoking RYO (roll-your-own) tobacco.
- 2. RYO is positioned as a cheaper alternative and for young smokers.

- 3. Marketing strategies are designed to provide quality reassurance.
- 4. Rolling tobacco is associated with a) successful and aspirational characteristics, and b) a natural and chemical free smoke.
- 5. Bootlegging is popular in the RYO market.
- 6. Bootlegging is seen as a legitimate and desirable distribution channel.

2.0 ANALYSIS OF INTERNAL DOCUMENTS

2.1 Consumer Research is Conducted to Explore Motivations for Smoking Rolling Tobacco

The documents demonstrate that research is conducted to explore peoples' motivations for smoking hand rolling tobacco. The cheaper price of this product category appears to be the primary motivation, particularly among young people. A number of other reasons also emerged. These include the taste, the economical nature of roll-ups (eg. self-extinguishing) and the psychological process of rolling the cigarette. The research highlighted that older smokers in particular appreciate and attach particular value to the rituals associated with rolling tobacco:

'Reasons for Rolling Your Own

PRICE: While price is the underlying factor it is not the only one. Price seemed the most important influence among the 18-25 year old age bracket, many of whom would prefer to smoke packet cigarettes. They are students or on low wages and roll their own to economise often switching between RYO and tailor-mades.

TASTE: Taste appears to be a significant factor for the longer-established RYO smoker. When they go back to a packet cigarette it seems tasteless and less natural - they perceive tailor mades have a more chemical taste.

TO SMOKE LESS: Due to the time involved in rolling and that sometimes in

TO SMOKE LESS: Due to the time involved in rolling and that sometimes it is inconvenient to roll-up they find they smoke less.

ECONOMY: Since roll ups go out when you put it down or stop dragging a tailor made burns on. May have jobs that make it difficult to smoke a whole cigarette on one occasion so that this is a real benefit to them. Individual roll ups are often relit several times, so that RYO smokers tend to prefer the convenience of a lighter to matches.

It was observed that there is huge psychological dimensions to RYO smoking that we could only touch upon in our investigation of papers. When people stop to think about it in the groups, they realise how much pleasure they derive from stopping whatever they are doing and the rolling process itself. There is a real art to RYO that is source of aspiration and pride. Older men have all the paraphernalia: a tin or a leather pouch for the tobacco, a special lighter, a roller/time and a couple added a filter. This seemed to give them peer-group status and image as a KNOWLEDGEABLE SMOKER.'

(Leading Edge Research Report, 1998)

Rolling tobacco clearly provides price benefits to the consumer. Price is known to be one of the most important factors affecting the level of tobacco consumption and consequently tobacco available at lower prices may discourage people from quitting. The industry recognises that price is becoming a particularly important influence among younger smokers.

Rolling tobacco has the potential to fulfil both the rational (eg. monetary costs) and emotional (eg. the rolling process, peer status) needs of smokers. The research also outlines that smokers perceive rolling tobacco to give them a more natural and less chemical smoke (see Section 2.4). Marketing strategies are developed to exploit these findings and meet the needs of different RYO smokers (see Section 2.2 and 2.3).

2.2 Rolling Tobacco is Positioned as a Cheaper Alternative to Cigarettes and for Young Smokers

The internal documents highlight that rolling tobacco has the potential to discourage smokers from quitting. The monetary cost of smoking is becoming problematic for many smokers and rolling tobacco is positioned as a cheaper alterative:

'The thinking

- For many smokers, the cost of smoking cigarettes is becoming increasingly difficult to justify.
- For many there is too much of a stigma attached to the cheaper RYO option.
- Amber Leaf cigarette packs provide the smoker with a perfect cheap alternative to cigarettes.

Who are we talking to?

- Cost conscious cigarette smokers who are tempted to buy RYO as a cheaper alternative.
- They will be young adult smokers. They will be independent, price conscious and not afraid to start/embrace new brands.

What should they think after seeing the advertising?

• Amber Leaf cigarette packaging is a good way of getting out of paying the high price on cigarettes - without the 'old man' stigma of buying traditional RYO brands and packs.

Proposition

The cheap alternative to a pack of cigarettes

(M&C Saatchi Creative Brief, 1998a)

Furthermore, the following extracts demonstrate that the industry is investing heavily in understanding the values of rolling tobacco to new market entrants, most notably the young. This product sector is being its traditional 'downmarket old man image' and is becoming more popular among younger people, which is due, in part, to bootlegging (see Section 2.5):

'The thinking

The roll your own market is growing fast and losing its downmarket old man image. Amber Leaf is perfectly poised to exploit the new market, but no one has heard of it. We need roll your own smokers to demand Amber Leaf.

Why are we advertising?

To make roll your own smokers demand Amber Leaf.

The roll your own market has traditionally been characterised by old, poor, grumpy, northern bloke in a pub reading the Sporting Life over a pint of warm ale. But not any longer. Bootlegging (illegal sale of cheap imported duty free from the continent) has reduced the price of tobacco hugely, attracting a more upmarket, slightly younger smoker to the market.

(M&C Saatchi Creative Brief, 1998a)

'The thinking

The roll your own market is growing fast and losing its downmarket old man image as younger smokers swap from cigarettes to roll your own because you get better value for money. Amber Leaf's piece pack is perfectly poised to exploit the new market, but no-one has heard of it.

We need to make people realise that smoking Amber Leaf makes perfect sense.

Why are we advertising?

To explicitly own the reason why cigarette smokers move to Hand Rolling Tobacco - good quality tobacco at a price lower than any brand of cigarette.

This is more relevant to Amber Leaf than any other brand of HRT as:

- 1. It comes in a piece pack with a set of papers it's the closest you get in HRT to a pack of cigarettes.
- 2. Amber Leaf is holding its price at £1.89 after the budget.

Who are we talking to?

18-34 year old cigarette smokers (B&H/Marlboro to L&B/Mayfair). They are finding the constant and ever bigger price hikes a bitter pill to swallow.

They're thinking of either trading down in price within cigarettes or moving to smoke hand rolling tobacco (at least some of the time).'

(M&C Saatchi Creative Brief, 1999)

2.3 Marketing Strategies are Designed to Provide Quality Reassurance

The documents highlight that the tobacco industry develop strategies to reassure smokers of their decision to switch to rolling tobacco by emphasising the quality of the products and by reassuring them that they have made a 'smart' choice. Golden Virginia, for example, is associated with 'classic', 'smart', and 'high quality tobacco':

'Who are we advertising to?

Although smokers talk about the positive product experiences of rolling their own cigarettes they are usually attracted to the market because of its economical nature. This tends to make the roller feel defensive about his choice - that he may be viewed as broke or skinflint. Golden Virginia can help address this by highlighting the quality (not posh) associations of the brand and therefore reassure or confirm the smoker's choice of tobacco.

The audience is unpretentious, proud and enjoy the simple pleasures in life. The majority of new RYO smokers are males in the 25-44 age group.

What must the advertising say?
Golden Virginia is for the perfect smoking moment.

Why should consumers believe this?

Smokers already see Golden Virginia as the Benson & Hedges of the RYO market, both brands are considered to be classic, smart and made with smooth smoking, high quality tobacco. The imagery which was used in the 'Craftsmen' campaign and the rich green and gold of the pack have helped build associations of warmth, relaxation and pleasure.'

(Lowe Howard-Spink Creative Brief, 1998)

Furthermore, rolling tobacco is associated with relaxation and time out from hectic schedules:

What should they think after seeing the advertising?

They should be pleased to find a brand making the effort to talk to them, reassuring them about their decision to smoke RYO. They should think 'I must ask my supplier (shop or bootlegger) for some, this seems like the discerning choice, the one for me.'

Substantiation

People largely switch to RYO on economic grounds. But once in the market, there are various factors which encourage loyalty. One of these is the association with relaxation and personal time rather than hectic, busy occasions where cigarettes might be a Friday night in a packed pub, RYO would be a quiet Sunday lunch in the pub with friends. Cigarettes are activity, speed, nervousness, on the go; RYO is confidence, relaxation, lack of pressure and time to chill.

Tone of voice

Fresh, confident and striking, but down to earth as well - these are not Soho bohemian types we are after.

(M&C Saatchi Creative Brief, 1997a)

2.4 Rolling Tobacco is Deliberately Associated with a) Successful and Aspirational Characteristics, and b) Natural and Chemical-Free Choices

The documents highlight that rolling tobacco brands are deliberately associated with successful and aspirational characteristics. A new rolling tobacco brand, 'Raw', aimed to 'open up the RYO market to a younger, trendier audience' and is associated with 'modern, bold, minimalist and funky' and 'youthful' characteristics:

'The thinking

- Due to increased taxation on cigarettes, more and more smokers will turn to RYO tobacco.
- However, smoking RYO has a very outdated, male image.
- Raw aims to open up the RYO market to a younger, trendier audience.

Tone of voice

What you see is what you get.

Natural.

Fresh.

Youthful.

(M&C Saatchi Creative Brief, 1998b)

'What do they think about the brand now?

Nothing as it does not yet exist.

Existing RYO brands are like dinosaurs and not especially for today's young adult smoker.

Research suggests that RAW will be seen as modern, bold, minimalist and funky.

These RYO smokers, having made the choice to move for monetary reasons, believe, and now enjoy, that RYO is a more natural way to smoke versus allegedly more additive filled cigarettes.

(M&C Saatchi Creative Brief, 1998b)

Similarly, Golden Virginia is associated with 'self-worth, independence, skill and choice':

'Brand position

6.3 Emotional Product Support

Golden Virginia is smoked by an increasing number of my contemporaries.

Golden Virginia is sensual.

Golden Virginia champions the good things in Roll Your Own:

Price and self worth

Independence

Relaxation

Skill

Choice

Golden Virginia is honest, sincere and has not pretensions.

Golden Virginia has warmth.

Golden Virginia treats me with respect.

(Mustoe Merriman Herring & Levy Communications Strategy, 1998)

Importantly, rolling tobacco is also associated with characteristics that imply this product category is not as unhealthy as cigarettes. The documents recognise that many smokers have concerns with the 'mass-manufactured, chemical nature of cigarettes' and there are many people who 'worry about the rubbish that is put into cigarettes these days'. For example, the Raw brand is described as 'unadulterated', 'pure', 'fresh' and is associated with 'transparency and naturalness'. Marketing strategies, including advertising, packaging and brand names, are used to convey these values and images. The new Raw brand best illustrates this process as witnessed by the following document extracts:

'Who are we talking to?

Specifically, the genuine smokers of this world, who go for the big 'hit' that smoking gives you, rather than the image that it lends you.

These people smoke with conviction.

Secondarily, all those smokers who worry about the rubbish that is put into cigarettes these days. There is a modern phenomenon that people want to do all of the things that they know are bad for them but not have to pay the consequences. Hence anything natural is deemed to be good.

(M&C Saatchi Creative Brief, 1998b)

'The thinking

- Many RYO smokers are looking for a more natural, additive free smoke.
- Raw tobacco is the purest form of RYO tobacco on the market (the only additive is a mould inhibitor).
- Therefore Raw is the natural choice for these smokers.

What should they think after seeing the advertising?

Raw is a new, modern RYO brand.

Raw offers a purer, more unadulterated smoke.

Proposition

Raw - the purest RYO tobacco you can buy.

Substantiation

Raw is the purest tobacco you can buy, it has no additives apart from something to stop it going mouldy in the pouch.

The Raw pack is see-through, enhancing the feel of transparency and naturalness.

(M&C Saatchi Creative Brief, 1998b)

'The thinking

- Many smokers dislike the mass manufactured, chemical nature of cigarettes.
- Raw RYO tobacco is unadulterated in both product, packaging and appearance.
- Raw is the tobacco for smokers who want a tobacco product which hasn't been buggered about with.

Why are we advertising?

To launch Raw, a new RYO tobacco brand for the new wave of young adult smokers entering the RYO market.

What do they think about the brand now?

About Raw: nothing - it's never been seen.

About RYO: people largely switch to RYO for economic reasons - it's so much cheaper than cigarettes - but once in the market there are good reasons for staying among them the ritual, the individuality and (crucially) the perceived untampered with nature of RYO when compared to cigarettes. Raw takes this idea further than any other RYO brand - it is raw by name, product, packaging and appearance.

What should they think after seeing the advertising?

Raw is a new, modern RYO brand for smokers just like me (and no-one else). It offers an unadulterated smoke.

Proposition

Unadulterated.

Substantiation

Raw is as unadulterated as tobacco can get - only mould inhibitors are added. Raw comes in an unadulterated transparent pack with a simple label on it.

Tone of voice

Raw. Edgy. Transparent. No nonsense.

Creative starter

No bullshit.

What you see is what you get.'

(M&C Saatchi Creative Brief, 1998b)

Similarly, Amber Leaf is described as 'light' and 'clean' and the documents recognise that many smokers perceive it to be more natural than cigarettes:

'Dear Phil,

Thanks for your call yesterday. Please find attached a brief with a small change to reflect your comments on the risks of discussing a full, rich taste etc. In the "substantiation" box we have added a comment that Amber Leaf is a very light, clean product to smoke (taken from the product notes you sent us). Largely, this will be a point which we will discuss with the creatives as part of our on-going conversations.

We feel that the naturalness area is potentially the most fertile, supported as it is by both strong product stories and an existing perception of the market as more natural than cigarettes. We have thus reduced the "as nature intended" proposition to simply "natural" and re-written the substantiation section to incorporate what seem to be the most interesting product stories.'

(M&C Saatchi Fax, date unknown)

'Substantiation

There is a perception of 'naturalness' around RYO tobacco, which leads to a fuller, richer taste and contrasts with the mass produced feel of cigarettes. While the reality is not quite so stark, Amber Leaf tobacco is of a very high quality. Particularly interesting product stories include:

- 17 varieties of tobacco from 7 countries (Brazil, Zimbabwe, Greece, Spain, Indonesia, Thailand, Argentina) blended.
- Only top grade leaf, all hand harvested and 80-85% hand stripped.
- Matured for several years.
- In taste terms, Amber Leaf does very well, particular strengths being freshness, lack of aftertaste and 'liveliness'.'

(M&C Saatchi Creative Brief, 1997a)

Overall, many of the associations the industry attempt to attach to rolling tobacco brands are designed to appeal to young smokers and lead them to believe that rolling tobacco products are more natural, and hence perhaps less harmful, than other types of tobacco. The documents make no reference to the fact that, because the majority of rolling tobacco smokers do not use a filter and tar and nicotine levels are not regulated, this product means smokers inhale more tar, nicotine and carbon monoxide.

2.5 Bootlegging is Popular in the RYO Sector

The documents highlight the sheer scale of bootlegging within the UK rolling tobacco market. Research by the tobacco industry highlights that the majority of smokers obtain the majority of their tobacco from illegal sources. The industry clearly takes a keen interest in the bootleg market and conducts their own independent research to establish its scale and nature:

'Grey Tobacco Purchases

21 out of our 28 respondents claimed to mainly buy 'grey' imported tobacco. The sheer scale of this took heading edge by surprise, but this 75% corresponds exactly to Gallaher's own estimates.'

(Leading Edge Research Report, 1998)

Another illustration of the scale of bootlegging within the UK RYO market is that smokers are familiar with 'Drum' which was not sold in the UK due to trade-mark restrictions. They had not however heard of 'Duma' – the UK-marketed version. This demonstrates that some bootlegged varieties are more popular and familiar among smokers than some domestically sold brands:

'A selection of RYO tobacco brands is pictured on the previous page. Bootleg sales skew brand loyalty towards the main brands. Golden Virginia and Old Holburn are the ones most commonly sold, with some Drum and Samson. Interestingly, respondents picked up on Duma when the packs were shown (towards the end of the group so as not to influence reactions to Swan/Amber Leaf papers) because they had never heard it called Duma - the UK marketed version - they only knew the bootleg variety: Drum.'

(Leading Edge Research Report, 1998)

This section demonstrates that the tobacco industry is aware that bootlegging is taking place and of the sheer scale of it. The following section demonstrates that they actively support this as part of their marketing strategies.

2.6 Bootlegging is Seen as a Legitimate and Desirable Distribution Channel

The documents highlight that access to bootleggers is crucial to rolling tobacco sales. The following creative brief demonstrates that Gallaher aim to promote their Amber Leaf brand to bootleggers in order to increase smokers' demand for the brand:

'The thinking

The roll your own market is growing fast and losing its downmarket old man image. Amber Leaf is perfectly poised to exploit the new market, but no one has heard of it. We need roll your own smokers to demand Amber Leaf.

Why are we advertising?

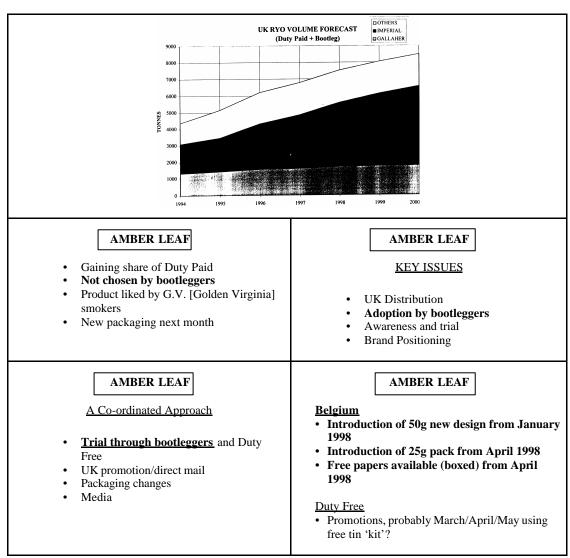
To make roll your own smokers demand Amber Leaf.

Bootleggers (who account for over 70% of the market in most areas) only bother with big brands - Old Holburn and Golden Virginia. We need to create a demand for Amber Leaf among the newer, younger consumers to encourage both shop purchase and a willingness among bootleggers to sell Amber Leaf.

What should they think after seeing the advertising? They should be pleased to find a brand making the effort to talk to them, reassuring them about their decision to smoke RYO. They should think 'I must ask my supplier (shop or bootlegger) for some, this seems like the discerning choice, the one for me.'

(M&C Saatchi Creative Brief, 1997a)

An Amber Leaf briefing breaks down smuggled tobacco by company and clearly identifies bootleggers in Belgium as an important route into the UK market:



(M&C Saatchi Presentation, 1997b)

Furthermore, an admission in a Golden Virginia communications strategy document demonstrates that tobacco companies deliberately increased sales to countries within Europe knowing they would be illegally smuggled back into the UK at half the duty paid price. The document highlights that Imperial Tobacco views their Golden Virginia brand as the 'major beneficiary' of this:

'The UK RYO market is undergoing a boom. After experiencing steady decline (along with other tobacco products) during the Eighties and early Nineties, the trend revered in 1993. The changed impetus came from Europe. There RYO taxation is at much lower levels. Primarily European brands began to be imported in some quantity into the UK and (illegally) resold, to such an extent that Drum, for trademark reasons not legally sold in the UK, achieved a near 17% of UK consumption. Initially UK manufacturers controlled the amount of stock they made available in France and Belgium - because of the different domestic market pricing structures, to substitute "European" for domestic duty-paid sales incurred margin loss. However, with the growth of illegal imports hastening the decline in the domestic duty-paid market, UK manufacturers chose to free supply to compete on the same playing field. As a result, low price product increasingly entered the UK from Europe, selling at half the Duty-Paid price. New RYO users entered the market from the cigarette market, and volume grew. Now more than 70% of UK consumption is sourced from Europe. Golden Virginia has been the major beneficiary of this new dynamic.'

(Mustoe Merriman Herring & Levy Communications Strategy, 1998)

3.0 CONCLUSIONS

This case study has demonstrated that the tobacco industry invest in consumer research to establish motivations for smoking rolling tobacco. Marketing strategies are then designed, through advertising, packaging, brand names and so on, to fulfil consumers' emotional needs. Such brands are associated with successful and aspirational characteristics such as 'funky', 'youthful' and 'modern'. Marketing strategies are designed to reassure smokers of the quality of the products and ensure them that they have made a 'smart' choice. Furthermore, this product category is associated with more natural, less chemical tobacco and the industry exploit this while recognising that this perception may be starker among smokers than is actually the case. Many of the characteristics that the industry attempt to associate the brands with completely contravene the voluntary regulations that were in place at the time. Similar to manufactured cigarettes, tar and nicotine levels need to be restricted and smokers informed of the increased dangers of smoking without a filter.

Perhaps the most concerning findings from this case study is that the industry actively support the market for bootlegged rolling tobacco products. They clearly see smuggling as a legitimate and desirable distribution channel and design strategies to market brands to bootleggers for example. Smuggling reduced the price of cigarettes and may therefore reduce some smokers' motivation for quitting. The government need to develop a comprehensive strategy for tackling cigarette smuggling and ultimately the responsibility should lie with tobacco manufacturers to take responsibility for the entire distribution chain.

REFERENCES

Archive References

Leading Edge (1998). *RYO Papers Exploratory Study: Qualitative Research Report*. Woking: The Leading Edge Consultancy, 26th March 1998. Doc No 0480.

Lowe Howard-Spink (1998). Creative Briefs. Doc No 0488.

M&C Saatchi (1997a). Amber Leaf Creative Briefs. Doc No 0504.

M&C Saatchi (1997b). Amber Leaf Briefing Presentation. Doc No 0502.

M&C Saatchi (1998a). Amber Leaf Creative Briefs. Doc No 0505.

M&C Saatchi (1998b). Raw and Drum RYO Creative Briefs. Doc No 0513.

M&C Saatchi (1999). Amber Leaf Creative Briefs. Doc No 0506.

M&C Saatchi (date unknown). RYO Facsimiles. Doc No 0547.

Mustoe Merriman Herring & Levy (1998). *Golden Virginia UK Communications Strategy. June 15th 1998, Third Draft.* Doc No 0594.

Additional References

ASH (2002). Factsheet No. 17: Tobacco Smuggling. London: Action on Smoking and Health UK (ASH), May 2002.

ASH (2003). *Tax & Smuggling: frequently asked questions*. London: Action on Health and Smoking (ASH), updated February 2003.

Joossens L (1996). *Hand-rolled tobacco should be taxed in the same way as manufactured cigarettes*. Union Internationale Contre le Cancer.

Key Note (2002). Cigarettes & Tobacco. Market Report 2002. Hampton: Key Note Ltd.

BIBLIOGRAPHY

Additional Rolling Tobacco References

CDP (1996). Hamlet Extra Mild Initial Media Proposals Presentation. Doc No 0111.

CDP (1999). Cigarette Market: An Overview Presentation. Doc No 0312.

Colquhoun Associates (1998). *Qualitative Research into New Pack Designs for Old Holborn. The Summary Report. Prepared for Gallaher Ltd.* Surrey: Colquhoun Associates Market Research Consultants. Doc No 0356.

Colquhoun Associates (1998). *Qualitative Research into RYO Habits and Attitudes. The Debrief Presentation Document. Prepared for Gallaher Ltd.* Surrey: Colquhoun Associates Market Research Consultants. Doc No 0358.

Gallaher Group Plc (1999). UK Marketing Division. Tobacco. Presentation. Doc No 0434.

Haslam Drury Partnership, The (1997). *Gallaher Ltd Project Banjo. Evaluating the Opportunity Presentation*. Doc No 0462.

Lowe Howard-Spink (1996). Creative Briefs. Doc No 0486.

Lowe Howard-Spink (1997). Creative Briefs. Doc No 0487.

Mustoe Merriman Herring & Levy (1998). Creative Briefs / Job Starts. Doc No 0588.

Mustoe Merriman Herring & Levy (1998). *Golden Virginia UK Communications Strategy*. *Third Draft*. Doc No 0594.

Mustoe Merriman Herring & Levy (1999). Creative Briefs / Job Starts. Doc No 0589.

Mustoe Merriman Herring & Levy (1999). Media Briefs. Doc No 0591.