Ms. Indra Nooyi, CEO  
PepsiCo, Inc.  
700 Anderson Hill Road  
Purchase, NY 10577

Mr. Tom Greco, President  
Frito-Lay North America  
P.O. Box 660634  
Dallas TX 75266-0634

Dear Ms. Nooyi and Mr. Greco:

Frito-Lay reportedly later this year will begin marketing two flavors (Cocoa and Vanilla Mocha) of caffeinated Cracker Jack snacks under the name Cracker Jack'D.\(^1\) Cracker Jack is a child's snack food. Whether or not the new products are advertised directly to children, it is certain that young children will consume Cracker Jack'D...and sometimes consume them to excess. Caffeine, be it as a purified chemical or as a component of coffee (which I understand will be the ingredient in two flavors of Cracker Jack'D) is a mildly addictive stimulant drug that is totally inappropriate to be included in foods consumed by children. Effects of caffeine include anxiety, restlessness, irritability, excitability, and insomnia.

The American Academy of Pediatrics has discouraged the consumption of caffeine and other stimulant substances in the diets of children and adolescents. That group stated:

Additional concerns regarding the use of caffeine in children include its effects on the developing neurologic and cardiovascular systems and the risk of physical dependence and addiction. Because of the potentially harmful adverse effects and developmental effects of caffeine, dietary intake should be discouraged for all children. Avoidance of caffeine in young people poses a great societal challenge because of the widespread availability of caffeine-containing substances and a lack of awareness of potential risks.\(^2\)

While I understand that Frito-Lay will market the new products only to adults, it's hard to imagine that the products will not be attractive to children. Certainly, label disclosures, such as "contains caffeine" or "not recommended for children" will not keep young hands

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\(^1\) [http://www.nationwidecandy.com/frito-lay-mx1-frito.htm](http://www.nationwidecandy.com/frito-lay-mx1-frito.htm)  
\(^2\) [http://pediatrics.aappublications.org/content/early/2011/05/25/peds.2011-0965.full.pdf+html](http://pediatrics.aappublications.org/content/early/2011/05/25/peds.2011-0965.full.pdf+html)
and mouths away from caffeinated Cracker Jack'D products.\(^3\) Kids will naturally be attracted to a tasty, finger-friendly snack food packaged and advertised with familiar Cracker Jack artwork (if, indeed, the packaging will have some of that artwork).

More broadly, I fear that PepsiCo's marketing of a caffeinated snack food will undoubtedly encourage other companies to start marketing caffeinated products and leading to something akin to the oat-bran craze. (Kraft is jumping on the bandwagon with its Mio Energy "water enhancer" and Crystal Light Energy products, and Jelly Belly is marketing caffeinated jelly beans; many smaller companies have started marketing caffeinated potato chips, gummi bears, popcorn, granola, and other products.)

Also, several state and city law-enforcement officials and United States senators recently expressed concern about the caffeine content and marketing of energy drinks. I suspect that they may also be concerned about other new sources of caffeine in the diet.

You, Ms. Nooyi, have expressed great interest in the health consequences—both positive and negative—of your company's products. I am sure that you recognize the unnecessary harm that caffeinated snack foods could inflict on American families. I urge you not to market Cracker Jack'D or other caffeine-containing snack foods.

Sincerely,

Michael F. Jacobson, Ph.D.
Executive Director

\(^3\) For over-the-counter stimulant drugs, the Food and Drug Administration requires warning notices (21 CFR 340.50(c)):

1. "The recommended dose of this product contains about as much caffeine as a cup of coffee. Limit the use of caffeine-containing medications, foods, or beverages while taking this product because too much caffeine may cause nervousness, irritability, sleeplessness, and, occasionally, rapid heart beat."

2. "For occasional use only. Not intended for use as a substitute for sleep. If fatigue or drowsiness persists or continues to recur, consult a (select one of the following: physician or doctor)."

3. "Do not give to children under 12 years of age."