



November 1, 2013

The Honorable Edward J. Markey
218 Russell Senate Office Building
Washington, DC 20510

The Honorable Richard J. Durbin
711 Hart Senate Office Building
Washington, DC 20510

The Honorable John D. Rockefeller
531 Hart Senate Office Building
Washington, DC 20510

The Honorable Richard Blumenthal
702 Hart Senate Office Building
Washington, DC 20510

Dear Senators Markey, Rockefeller, Durbin and Blumenthal:

I am writing in response to your letter addressed to Gregg W. Steinhafel, CEO & President of Target Corporation, regarding the marketing and promotion of Archer Farms Energy Drinks and up&up Energy Shots. Target is committed to providing our guests with safe, high quality products. We place great emphasis on sourcing food from industry leaders in food safety and quality, and we require our vendors to fully comply with all regulatory requirements in the production of food products for our guests. Additionally, we have a robust food safety and quality assurance program at our Minneapolis headquarters to ensure high standards for our owned brand food products.

Target welcomes the opportunity to provide you with information regarding the marketing, labeling, and promotion of these products, especially with respect to children. Target takes very seriously our commitment to the responsible marketing of Archer Farms Energy Drinks and up&up Energy Shots. Marketing for these products are not child-directed and are not promoted in a way that would make them more attractive to children.

The Archer Farms Energy Drink line and up&up Energy Shots are neither designed for nor marketed to children or teenagers. These products are designed to appeal to adults with an active lifestyle. The packaging and products were designed to appeal to that demographic as a quick refreshment that is an alternative to soda.

Our marketing does not and will not promote, encourage, or condone excessive consumption or inappropriate mixing of these products with alcohol or medication. Our marketing does not and will not make any claim that the consumption of alcohol together with an energy drink counteracts or otherwise positively impacts the effect of alcohol consumption. Our marketing does not and will not make any claim that the consumption of an energy drink in any way counteracts or otherwise positively impacts the effects of sleeping pills or other drugs.

Government Affairs
1155 F Street NW, #925
Washington, DC 20004

Archer Farms and up&up products are sold exclusively at Target stores and are not distributed by Target to vending machines or other outlets in schools, nor does Target conduct sampling of these products in schools. We recognize the importance of a safe and healthy environment for our children to learn, as underscored by our commitment to give \$1 billion to support education by 2015.

With regard to the information we provide to guests on packages, our Archer Farms Energy Drink packaging states the amount of caffeine (70mg) per serving, with each 12 oz. can containing one serving. This information is printed at the top of the nutrition facts panel.

Our up&up Energy Shots carry the following advisory language to ensure the product is consumed appropriately:

- Never consume more than 2 bottles in one day. 2 fl. oz. of energy shot contains an amount of caffeine similar to a premium cup of coffee. Persons sensitive to caffeine should take with caution. Stop using if you experience nervousness, sleeplessness, or rapid heartbeat. Do not use if you are pregnant or nursing. Not for use by children under 12 years of age.

As you know, the Food and Drug Administration (FDA) is in the process of considering current safety data on caffeine, including data relating to caffeine-containing energy drinks. Target will continue to monitor FDA Guidance and activities related to energy drink and energy shot products.

At Target, we have a strong history of supporting children and schools and our marketing efforts support that pledge. We appreciate the opportunity to participate in this important conversation. Please let us know if you or your staffs have any further questions.

Sincerely,



Matt Zabel
Vice President
Government Affairs