



Tillamook County Creamery Association

Disclosure Report

Date Submitted: January 25, 2024



Disclosure Materials

Certified B Corporations must complete a Disclosure Questionnaire to identify potentially sensitive issues related to the company (e.g. historical fines, sanctions, material litigation, or sensitive industry practices).

This component does not affect the company's score on the B Impact Assessment. If the company answers affirmatively to any items in the Disclosure Questionnaire that B Lab deems relevant for public stakeholders, then, as a condition of their certification, the company must:

- 1) Be transparent about details of the disclosure issues identified on the company's public B Impact Report
- 2) Describe how the company has addressed this issue
- 3) Demonstrate that management practices are in place to avoid similar issues from arising in the future, when necessary.

In all cases, the Standards Advisory council reserves the right to refuse certification if the company is ultimately deemed not to uphold the spirit and integrity of the community.

In addition to the voluntary indication of sensitive issues in the Disclosure Questionnaire, companies pursuing Certification also are subject to a background check by B Lab staff. Background checks include a review of public records, news sources, and search engines for company names, brands, executives/founders, and other relevant topics.

Sensitive issues identified through background checks may or may not be within the scope of questions in the Disclosure Questionnaire, but undergo the same review process and are subject to the same possible review by the Standards Advisory Council, including ineligibility for B Corp Certification, required remediation, or disclosure.

This document contains a copy of the company's completed Disclosure Questionnaire and related disclosure documentation provided by the company



Disclosure Questionnaire

Industries and Products

	Yes	No
Please indicate if the company is involved in production or trade in any of the following. Select Yes for all options that apply.		
Animal Products or Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Biodiversity Impacts	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chemicals	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Firearms Weapons	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Mining	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Pornography	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Tobacco	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Energy and Emissions Intensive Industries	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Fossil fuels Gambling	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Genetically Modified Organisms	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Illegal Products or Subject to Phase Out	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Industries at Risk of Human Rights Violations	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Monoculture Agriculture	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Nuclear Power or Hazardous Materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Payday, Short Term, or High Interest Lending	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Water Intensive Industries	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Tax Advisory Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Outcomes & Penalties

	Yes	No
Please indicate if the company has had any formal complaint to a regulatory agency or been assessed any fine or sanction in the past five years for any of the following practices or policies. Check all that apply.		
Anti-Competitive Behavior	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Breaches of Confidential Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Bribery, Fraud, or Corruption	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company has filed for bankruptcy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Consumer Protection	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Financial Reporting, Taxes, Investments, or Loans	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Labor Issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Large Scale Land Conversion, Acquisition, or Relocation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Litigation or Arbitration	<input checked="" type="checkbox"/>	<input type="checkbox"/>
On-Site Fatality	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Penalties Assessed For Environmental Issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Political Contributions or International Affairs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Recalls	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Significant Layoffs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Violation of Indigenous Peoples Rights	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Practices

	Yes	No
Please indicate if the following statements are true regarding whether or not the company engages in the following practices. Check all that apply. If the statement is true, select "Yes." If false, select "No."		
Animal Testing	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company prohibits freedom of association/collective bargaining	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company workers are prisoners	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Conduct Business in Conflict Zones	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Confirmation of Right to Work	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does not transparently report corporate financials to government	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Employs Individuals on Zero-Hour Contracts	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Facilities located in sensitive ecosystems	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ID Cards Withheld or Penalties for Resignation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No formal Registration Under Domestic Regulations	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No signed employment contracts for all workers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Overtime For Hourly Workers Is Compulsory	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Payslips not provided to show wage calculation and deductions	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Yes	No
Sale of Data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tax Reduction Through Corporate Shells	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers cannot leave site during non-working hours	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers not Provided Clean Drinking Water or Toilets	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers paid below minimum wage	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers Under Bond	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Supply Chain Disclosures

	Yes	No
Please indicate if any of the following statements are true regarding your company's significant suppliers.		
Business in Conflict Zones	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Child or Forced Labor	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Negative Environmental Impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Negative Social Impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Animal Products and Services

Topic	Animal Welfare
Summary of Issue	As a dairy products manufacturer, Tillamook County Creamery operates in an industry in which animal welfare is a material issue.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	Tillamook County Creamery Association is a dairy product manufacturer and sources >50% of their supplier expenses from animal farms.
Impact on Stakeholders	For businesses involved in animal agriculture, the well-being of the animals themselves is of paramount importance. Businesses involved in animal agriculture, or products resulting from animal agriculture, should focus on preserving the Five Freedoms of animal welfare to reduce impacts.
Management Practices	<p>Tillamook County Creamery Association has a number of animal welfare standards that are required throughout their supply chain. Organizationally, they have established a team of experts to ensure compliance with internal policies, government regulations and industry best practices pertaining to animal welfare. The Director of Farm Services is a licensed veterinarian with years of farm-level experience, and she serves as the liaison between our farmers and TCCA. TCCA farmer-owners play a critical role as both owners and as suppliers. The company's Cooperative Member Handbook guides the relationship between the farmer-owners and TCCA by setting expectations for both parties. Additionally, their Contract Milk Suppliers Handbook guides the contractual requirements for milk sourcing from their contract suppliers and it includes policies on animal welfare and milk quality.</p> <p>The company follows the nationally recognized FARM Program/Validus practices and audits to ensure ethical treatment of their farm animals. Farmers Assuring Responsible Management™ (FARM) was designed as a common set of practices for the humane and ethical treatment of dairy cows. Farmers who follow these practices are required to operate within the prescribed guidelines in the FARM Animal Care Reference Manual. The manual covers subjects ranging from cow nutrition and animal health to animal environment and safe facilities. All farmer-owners and contract milk suppliers participate in the FARM program or equivalent.</p> <p>The integrity of the FARM program is upheld by on-farm assessments, conducted by second-party and third-party industry experts. The company's Farm Services Team also conducts regular evaluations to ensure farms are compliant with the FARM program, the Cooperative Member Handbook, health and food safety standards and best management practices.</p>
Report	https://nationaldairyfarm.com/what-is-farm/



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Environmentally Intensive Industries

Topic	Biodiversity Impact
Summary of Issue	As a dairy products manufacturer, Tillamook County Creamery operates in an industry in which biodiversity impact is a material environmental issue.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	Approximately 100% of Tillamook County Creamery Association's supplier expenses come from the product or service related to biodiversity impacts.
Impact on Stakeholders	Animal agriculture has a variety of impacts on local ecosystems that may create material risk, including to biodiversity. These impacts are inclusive of flora and fauna, habitats, as well as soils.
Management Practices	<p>Tillamook County Creamery Association is a farmer-owned co-op dedicated to making the best dairy products with the best ingredients. From their beginning, they have treated the land, their people and animals with care and respect with the following practices:</p> <ul style="list-style-type: none">• Over 90% of TCCA member-owners practice cover cropping and "keeping the ground covered" throughout the year is one healthy soils practice. Their climate action plan includes 12 on-farm strategies such as manure composting that also aim to improve soil health and biodiversity.• In 2020 TCCA helped Trout Unlimited's Salmon Superhighway (SSH) team successfully apply for a grant to replace old, undersized culverts to enhance aquatic connectivity and restore riparian habitat to protect water quality, including stream shading. The \$1.2MM U.S.D.A. Regional Conservation Partnership Program (RCPP) grant was titled "Tillamook Watersheds Conservation Partnership." As the "Partnership" name implies, TCCA is one of the leading partners on this grant - providing \$400,000 in monetary support to cover the landowner share for the projects, and \$100,000 of in-kind donation such as farmer outreach, education, and assistance with enrollment over the next 5 years.• In 2022 the company surveyed over 7,000 acres of land and found their member-owner soils on average were holding 53 tons of carbon per acre, some of the highest in the country.• Water Stewardship Grants: Every year, TCCA allocates \$25,000 or more towards environmental grants for our farmer-owners. Historically, these grants have supported streamside restoration projects, removal of non-native vegetation and the planting of native vegetation. The company often partners with Tillamook Soil and Water Conservation District and the Tillamook Estuaries Partnership on these projects.• TCCA partnered with The Freshwater Trust (TFT) to conduct a comprehensive evaluation of the Tillamook Bay watershed in order to identify hot spot areas for poor water quality, which may affect aquatic life. TFT helped establish a baseline year for key indicators of watershed health, upon which the company can measure any improvement or decline in ecosystem health. Watershed health indicators included: salmon habitat, sediment, nutrient and bacteria quantity, stream temperatures and wetland health. By initiating and funding this study, TCCA was able to have a better understanding of our relationship with and impact upon the surrounding water bodies.• TCCA has been working with The Tillamook Estuaries Partnership (TEP) for



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Environmentally Intensive Industries

Topic	Water Intensive Industries
Summary of Issue	As a dairy products manufacturer, Tillamook County Creamery Association operates in an industry that is water intensive. Water is required in agricultural production of ingredients, the manufacturing of dairy products and sanitation of facilities
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	100% of the company's revenue comes from products related to water-intensive use.
Impact on Stakeholders	Animal agriculture has a variety of impacts on local ecosystems that may create material risk, including water. As a water intensive industry, animal agriculture poses risks such as water stress or depletion of local water sources if water use is not appropriately managed.
Management Practices	<p>Tillamook County Creamery Association has a dedicated Goal Zero team which monitors their water consumption and identifies conservation opportunities in manufacturing processes. Improving efficiencies in manufacturing facilities allows them to reduce their overall water consumption and ensure that any wastewater discharge has minimal to no impact on local watersheds.</p> <p>Each year the company publicly reports water use in their Stewardship Report, with a target of -1% year over year change in total gallons of water consumed, normalized by milk pounds received. The company also publicly reports to the Innovation Center for US Dairy's Sustainability Alliance. TCCA compares and tracks water usage and carbon emissions to other food producers routinely several times per year through the association with Food Northwest. Food Northwest is a collection of food producers, including dairy manufacturing, in Washington, Oregon, and Idaho. Several TCCA employees serve on the Food Northwest board of directors, energy committee, environmental committee, and other committees.</p> <p>TCCA is also a member of the Innovation Center for US Dairy Sustainability Alliance. This organization has a long history of collaboration, including a water committee that we participate on. In 2019 their metrics were finalized, and in 2020 we started submitting our resource use data, which will serve as a benchmark for the dairy industry in the United States.</p>
Report	https://www.tillamook.com/stewardship/enduring-ecosystems/2022-water



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Environmentally Intensive Industries

Topic	Energy and Emissions Intensive Industries
Summary of Issue	As a dairy products manufacturer, Tillamook County Creamery Association operates in an industry in which energy and carbon emissions is a material environmental issue.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	Approximately 100% of company revenues come from the product or service related to energy-intensive use
Impact on Stakeholders	Agriculture results in greenhouse gas emissions. According to the U.S. Environmental Protection Agency, total agriculture contributes about 10% of total GHG emissions (2021). Industry research shows animal agriculture represented by the U.S. dairy industry contributes 2% or less of national GHG emissions. Nevertheless, the industry is focused on this particular material impact.
Management Practices	<p>Tillamook County Creamery Association's manufacturing is from Tillamook People's Utility District (PUD), which sources electricity from Bonneville Power Administration (BPA). Energy from the grid is approximately 85% renewable. TCCA also pays extra for their Green Power Program, and has 100 percent renewable energy for The Creamery visitors center and 10 percent for the manufacturing plant needs.</p> <p>Some of the Green Power Program electricity comes from 3 dairy digesters located in Tillamook County. Through the company's purchasing, TCCA is financially supporting their farmers' renewable energy and reducing manure associated with methane emissions. BPA's electrical power is generated by 31 federal hydroelectric projects in the Northwest, one non-federal nuclear plant and several small non-federal power plants.</p> <p>In 2022, TCCA released their Climate Action Plan (CAP), with a target of reaching a 30% reduction in absolute emissions from a baseline year of 2020. TCCA collaborated across multiple departments to gather strategies and worked with an external consultant team to calculate drawdown potential. The CAP has 27 strategies that were identified by TCCA staff modeled by a consultant team to assess GHG reduction potential. These strategies can be broken down into Facilities, Fleet, and Farms.</p> <p>Facilities: TCCA drives change through our Energy Policy which considers electricity, fuel and steam usage at their operating sites including Tillamook Office and Manufacturing Facility, Boardman Office and Manufacturing Facility, Farm Stores, The Tillamook Creamery visitors center, and the Portland Outpost. In 2021 TCCA established a Goal Zero team that is composed of members from Stewardship, Engineering, Continuous Improvement and Maintenance. This team meets regularly to audit, identify and implement projects that reduce energy, water and waste at our facilities.</p> <p>Fleet: TCAA uses driver training technology and has made aerodynamic body modifications and low rolling resistance tires on their fleet. In 2022, they replaced petroleum-based diesel with renewable diesel, resulting in 66% fewer</p>

	<p>emissions per gallon.</p> <p>Farms: TCCA has a dedicated Farm Services Team that works to reduce emissions from milk, which includes methane produced during enteric fermentation (cow burps), methane from manure management, and carbon dioxide and nitrous oxide emissions from feed production. To address this, the company is investing in manure management strategies such as expanding dairy digester use, solid/liquid separation, manure tank covers and composting. TCAA will also be trialing innovative feed supplements that reduce methane emissions and mixed ration diets to reduce enteric methane emissions. Another focus for TCCA is soil health management, which can increase soil organic matter, feed microbial populations and sequester carbon. In total, TCCA has 12 climate action strategies for farmers.</p>
Report	https://www.tillamook.com/climate



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Recalls

Issue Date	2018-2023
Summary of Issue	Tillamook County Creamery Association has had 3 recalls in the last five years due to color dye used in chocolate that was not approved by the FDA and the mislabeling of the product which were all labeled as a FDA Class 2 recalls.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	Less than 1% of the company's overall production was recalled across 3 separate incidents.
Impact on Stakeholders	While the FDA was involved in the recalls, there were no reported or known consumer illnesses or injuries nor any medical treatment reported or known.
Resolution	Once the issues were identified, the company recalled all products that were considered to be at risk.
Management Practices	To prevent this in the future, the company created additional policies to share with their suppliers and has implemented a second party audit to verify compliance to their standards in addition to improving training for their operators.



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Litigation, Arbitration, and/or Penalties

Issue Date	August 2020
Topic	Litigation and Arbitration
Summary of Issue	<p>Over the last 5 years the company has had 3 class action lawsuits related to alleged misleading marketing in relation to their products, 2 closed and 1 is still pending.</p> <p>Case 1: (August, 2019). 1 class action lawsuit claiming vanilla flavoring in ice-cream product (natural vanillin) not being able to be identified as natural according to ice-cream regulatory labeling guidelines. Case settled and closed.</p> <p>Case 2: (August, 2020). 1 class action lawsuit claiming vanilla flavoring in yogurt product (natural vanillin) not qualifying as natural. Case settled and closed.</p> <p>Case 3: August 2019, 1 class action lawsuit still pending in relation to marketing claims, for which the matter is protected by a confidentiality agreement.</p>
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	All cases are protected by a confidentiality agreement.
Impact on Stakeholders	Tillamook County Creamery consumers were affected.
Resolution	Two cases have been settled and payments have been made.
Management Practices	The company implemented labeling adjustments for the closed class action lawsuits.
Related Incidents (Yes/No)	No