



FRUIT, SHEEP, AND GAPS CERTIFICATIONS

TOPP FRUIT, LLC

FARMERS: Harrison Topp and Stacia Cannon

LOCATION: Paonia, CO on the Western Slope

LAND BASE: 40 acres

MARKETING: Varies year to year, with some wholesale and some direct market

EMPLOYEES: 2 full-time, 4 part-time sporadically throughout the season

FOOD SAFETY BASICS: Have a written farm food safety plan. Harmonized GAPs compliant. Qualified exempt from FSMA.

Topp Fruit, LLC is a certified organic tree fruit farm in western Colorado run by Harrison Topp and Stacia Cannon. The farm has been in operation for six years, but they scaled up significantly in 2018. Cannon also raises sheep for meat and breeding under another business name, and they've begun to incorporate the sheep into their orchards via rotational grazing. The fruit is GAPs certified and the farm shifts their sales from year to year, depending on the volume of the crop, the market outlook, and how ambitious the farmers feel about marketing that year.

Food Safety Trainings in Colorado

Colorado has a very cohesive team working together to provide food safety education to farmers called the CO Food Safety Collaborative. The group is comprised of non-profit and state organizations including Colorado Fruit & Vegetable Growers Association, Colorado State University Extension, CO Department of Agriculture, and the Rocky Mountain Farmers Union (RMFU), where Harrison works. This team has worked closely to ensure that the implementation of the Food Safety Modernization Act's (FSMA) Produce Safety Rule is very grower-focused and has worked with the Colorado Department of Ag to understand the impact of the Rule on growers.

Harrison started to become aware of the shifts in food safety around the time FSMA passed. He submitted comments on the Rule when it was just an idea, and, as he was becoming involved with RMFU, it became official. In his role with RMFU, he became certified to teach produce safety trainings. Like a lot of upstart farmers, he and Stacia quickly became more engaged in improving food safety practices as the standards became more widely accepted.

Writing a Farm Food Safety Plan

Topp Fruit's buyer required a Harmonized GAPs audit in 2018,



and they were required to write a formal food safety plan to pass. In addition to being a PSA trainer, Harrison has taught a number of food safety plan writing workshops, and we spoke in depth about the process. Harrison jokes that he went to a good college and is a relatively intelligent person and writing a farm food safety plan the first time was probably the hardest thing he's ever done. It's simply not a user-friendly process, and he feels that the way we traditionally teach it—by providing a variety of handouts and various templates—didn't work for his brain or farm needs. Once he had a buyer who clearly asked for a specific audit—Harmonized GAPs—he was able to move forward with creating a plan to match the audit's requirements. Harrison asked a neighbor who had passed the same audit to share his plan, and he used that as a template, along with the HGAPs checklist and the HGAPs Standard. He used the checklist and standard in printed form and had the template to edit on his computer. Using these tools, he went step by step through the checklist and made sure that each requirement of the audit was clearly addressed in the food safety plan, often using much of the same language from the HGAPs Standard.

This is the same writing plan that he tries to teach other farmers who are writing their farm's food safety plan. He has since shared his file as a template with about a dozen other farmers. Having a friend or a neighbor who has gone through the process and to whom you can ask specific questions about sections that may feel unclear has been really helpful.

Having an Audit

The Colorado Department of Agriculture (CDA) does a "desk audit," where farmers can sign up in April or May to meet with the auditor and go through the audit and food safety plan page-by-page. The field audit, which happens later in the growing season, is more like a field check to ensure that you're doing what you planned, rather than an in-depth review of the plan. During the desk audit (which is official), the auditor is able to give a little feedback and say when something isn't right so that the grower has time to edit the plan before the auditor returns for the field inspection. CDA has specialty crop block grants that provide growers with a 50% cost share to cover the expense of the audit.

Recordkeeping and Other Documentation

Harrison is honest about how challenging

recordkeeping can be, but says that the process of learning to keep better records has been helpful beyond passing an audit. While it isn't really helpful to look back from one year to the next and know that the truck was inspected and swept out before market, keeping shipping bills, lot numbers, and material applications organized has proved very helpful. Many of the food safety records are duplicates of records Topp Fruit is keeping for their organic certification or to meet worker protection standards, so that makes the recordkeeping seem less onerous.

Incorporating Rotational Grazing

In 2019, Topp Fruit began to incorporate rotational grazing by running a flock of sheep intensively between their trees. Harrison and Stacia used elecronet to mob graze the sheep, moving them every few days to ensure that they ate all of the grass under the trees. Under their GAPs program, the largest consideration was that their sheep needed to be removed from the orchard 90 days prior to harvest when fruit is present but very small. (This 90 days prior to harvest standard is mirrored in organic certification, as well.) Additionally, their food safety plan says that they'll wear clean clothing, wash their hands after handling the sheep, and keep the sheep from accessing the irrigation water supply. Once the flock is moved from the orchard to a more marginal unplanted part of the farm, they're kept downhill from any trees or water sources so they're unlikely to cause runoff issues.

In its first year, Topp Fruit's attempts to incorporate sheep had some struggles, as most first-year ventures do. They're looking to minimize the time they spend moving the sheep by buying a side arm mower and trying to streamline some of their practices. They hope to see a more quantifiable benefit in terms of soil health after more seasons of incorporating livestock. Meanwhile, the presence of the sheep hasn't impacted their ability to be GAPs certified, and some buyers are particularly excited about the integration.

