WORKSHEET 1.1

The HACCP Illusion

Subchapter 1.1 · case in the book: San Sebastián

If your food safety plan were perfect, who in this hotel would notice the day the hotel began producing food that the plan does not describe?

This worksheet turns the tools of the subchapter into a form you can fill in. The texts come from the book; the empty columns are for your own property. Adapt it before use: an unadapted checklist is exactly what the book warns against.

Practical application: what to do in your property

Step (from the book)	Done?	What we found / owner
Week 1–2: Walk the building with the food; list every point of production, holding and service		
Week 2: Appoint the food safety team leader; define authority to suspend a service		
Week 3–6: Confirm on site the flow diagrams for every point in scope; extend the hazard analysis		
Week 4: Write the change triggers; add team-leader sign-off to every banquet event order		
Month 3: First management review chaired by the owner		

These steps are the book's method, not requirements of ISO 22000. Evidence can take whatever form suits the property; a separate document is needed only where an applicable requirement, or the property's own system, makes it necessary.

Verification Pact: what is believed, tested against the standard

What is commonly believed	What actually holds	Our position
"ISO 22000 is HACCP with more paperwork."	No. HACCP principles are one of four key elements, placed inside a management system. The difference is not paperwork but who governs the plan and when it must change.	
"If our HACCP plan is sound, we already meet ISO 22000."	No. The plan corresponds to part of clause 8. Context, scope, leadership, the team leader, objectives, communication, review and update are separate requirements.	
"ISO 22000 is for food manufacturers, not hotels."	No. The standard applies to any organisation in the food chain, whatever its size. Food service is inside its scope by design.	
"The executive chef must be the food safety team leader."	No. Top management must appoint a team leader with defined responsibilities. The standard does not say who; subchapter 1.7 explains why the chef is often the wrong choice.	

What is commonly believed	What actually holds	Our position
"Certification replaces our legal obligations."	No. The standard requires applicable statutory and regulatory requirements to be taken into account. It does not replace them, and an inspector will not accept a certificate in their place.	
"A certified system guarantees there will be no outbreak."	No. The system aims to reduce hazards to acceptable levels and to keep control demonstrable. Certification attests conformity at the time of audit, not the absence of risk.	
"Food safety culture is an ISO 22000 requirement."	Not in the 2018 edition. The Codex introduced it in its 2020 revision of the general principles; the 2026 draft of the revision of ISO 22000 proposes to make it a requirement; the final text will decide. In the EU it has been a legal requirement for food businesses since 2021 (Regulation (EU) 2021/382). Subchapter 1.13 deals with it.	

Common mistakes: a self-check

Mistake (from the book)	Present here?	Action / owner
Treating the HACCP plan as the system		
Letting the plan's scope be set by the consultant's walk		
Opening outlets and formats without reopening the hazard analysis		
Appointing the executive chef as team leader by default		
Reviewing the plan once a year whatever happens		
Reading the health inspection as a verdict on the system		

Operative synthesis

- **For an owner who wants to know whether the hotel has a plan or a system, five decisions and five pieces of evidence are enough. Each can be checked in an afternoon, and none requires technical knowledge of food.**
- **Define where the system begins and ends (Top management): A written scope listing every point of production, holding and service, with exclusions justified**
- **Appoint a food safety team leader with cross-departmental authority (Top management): A written appointment, known to the chef and to sales**
- **Connect business changes to the hazard analysis (Team leader, with sales and operations): A trigger list and signed banquet event orders**
- **Confirm the flow diagrams where the food actually goes (Food safety team): Diagrams dated and signed after an on-site walk**

› **Review the system at the owner’s table (Top management): Minutes that contain decisions, owners and dates, not only data**

Action plan for our property

Action	Owner	Due	How we will know it worked

Source: Francesco Dore, The Helm and the Lens, Volume 6a «The Helm», subchapter 1.1. Edizioni Effedore, 2026. Clause references are paraphrased; this sheet does not reproduce the text of ISO 22000. It is not legal advice: food law is that of the place where the property operates.