WORKSHEET 2.12

Food Defence and Food Fraud: What the Standard Does Not Ask

Subchapter 2.12 · case in the book: Geneva

Which of the most expensive products on your menu could be replaced by something cheaper without anyone in your kitchen noticing, and who could reach your guests' food who should not?

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
Day 1: Withdraw caviar stock; inform inspectorate; remove broker		
Day 2–3: Protected-table protocol drafted and agreed for the ministerial dinner		
Week 2: Context and interested-party records amended; boundary with the FSMS stated		
Week 2–4: Fraud vulnerability assessment of purchasing list		
Week 3–5: Food defence threat assessment of all food routes		
Yearly: Review both assessments; species tests on high-value products		

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 22000:2018 requires a food fraud vulnerability assessment."	No. Food fraud is named as an example of a context issue in a note. No assessment is required as such.	
"ISO 22000:2018 requires a food defence plan."	No. Food defence and intentional contamination are named in the same note. No plan is required as such.	
"Fraud is a commercial matter, outside food safety."	Not when it creates a hazard. Hazards introduced by fraud must be identified and controlled like any other.	
"The next edition will require both."	Not established. The draft annexes on fraud and defence were removed by the working group. The final text will decide.	

What is commonly believed	What actually holds	Our position
“A certified supplier cannot be fraudulent.”	No. Certification attests a system. Supplier evaluation and monitoring must be adequate to the risk of the product.	
“Food defence means locking the kitchen door.”	No. It concerns every point where food is exposed to people who should not have access, including buffets, trolleys and events.	

Common mistakes: a self-check

Mistake (from the book)	Present here?	Action / owner
Assuming certification covers fraud and tampering		
Assuming fraud is outside food safety		
Exempting premium suppliers from normal controls		
Equating food defence with building security		
Waiting for clients to ask		
Overstating what the programme covers		

Operative synthesis

- **For a general manager, the most useful question is the one in the guiding box, asked of the chef and the sommelier together: which of our most expensive products could be replaced without our noticing? If the answer is none, it is probably wrong. If the answer is a list, the list is the beginning of a vulnerability assessment.**
- **The same question has a counterpart for food defence, best asked of the security director and the banqueting manager together: at our next large event, where will food be when nobody is watching it? The answer is usually a short list (a back corridor, a service lift, a trolley outside a room), and each item on it is a place where a named person, for a few minutes, would close the gap.**
- **Has the hotel decided, on the record, whether fraud and defence are relevant? (Team leader): Context record with reasons**
- **Are high-value products bought through controlled channels, with checks? (Purchasing and chef): Vulnerability assessment; supplier documentation; test results**
- **Are hazards that fraud could introduce in the hazard analysis? (Food safety team): Hazard analysis entries**
- **Has every point where food is exposed to unauthorised access been assessed? (Team leader and security director): Threat assessment**
- **Is it clear which measures are within the certified system and which are not? (Team leader): Boundary statement**

Action plan for our property

Action	Owner	Due	How we will know it worked

Action	Owner	Due	How we will know it worked

Source: Francesco Dore, The Helm and the Lens, Volume 6a «The Helm», subchapter 2.12. 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.