WORKSHEET 3.11

Auditing the Reasoning, Not the Records

Subchapter 3.11 · case in the book: Osaka

Your audits confirm that the hazard control plan is applied. Has anyone ever audited whether the plan is right, whether each hazard was scored, and each control measure classified, by a reasoning that someone else could follow and check?

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
Rescoring: The food safety team reviewed every step where the likelihood note referred to an existing control, rescored them before controls, and added the resulting control measures to the hazard control plan.		
A written reasoning for every categorisation: Each critical control point and operational prerequisite programme received a short record of the systematic approach: failure likelihood, severity of failure, feasibility of limits,...		
The guest assumption: The hazard analysis gained a section describing the guests assumed for each product, including vulnerable and foreign guests, reviewed whenever the guest mix changed materially.		
A yearly reasoning audit: One internal audit a year would test a sample of the hazard analysis against the four tests, with a technical expert, separately from the audits of monitoring.		

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
"The hazard analysis is for experts; internal audit checks the plan."	No. The decision process and results must be documented, and the internal audit covers conformity to the standard.	
"Likelihood should reflect the controls already in place."	No. Likelihood is assessed before the application of control measures.	
"The standard prescribes a five-by-five matrix."	No. It requires a described methodology; the choice is the organisation's.	
"Supplier approval is enough for any raw ingredient."	Not as stated. Acceptable levels and the selection of control measures must be justified for the intended use.	

What is commonly believed	What actually holds	Our position
“An auditor who would score differently has a finding.”	No. A finding arises when the reasoning does not meet the requirements, not when it differs from the auditor’s view.	

Common mistakes: a self-check

Mistake (from the book)	Present here?	Action / owner
Auditing only the monitoring		
Likelihood scored after controls		
Same hazard, different scores		
Decisions kept in the leader’s head		
Guests assumed to be like the team		
Auditor replaces the team’s judgment		

Operative synthesis

- **Is the hazard assessment method described and followed? (Food safety team leader): Method; sample of steps**
- **Are acceptable levels determined and justified? (Food safety team leader): Records under 8.5.2.2**
- **Is each categorisation supported by a recorded systematic approach? (Food safety team leader): Records under 8.5.2.4**
- **Are assumptions about guests stated and current? (Food safety team leader): Intended-use section**
- **Is the reasoning audited, with a technical expert? (Programme manager): Audit plan and report**
- **When was our hazard analysis itself last audited?: A date, an expert, and the findings**
- **Which decision in it would we find hardest to defend?: A named decision, now documented**
- **Who are the guests our analysis assumes?: A written description, recently reviewed**

Action plan for our property

Action	Owner	Due	How we will know it worked

Source: Francesco Dore, The Helm and the Lens, Volume 6b «The Lens», subchapter 3.11. Edizioni Effedore, 2026. Clause references are paraphrased; this sheet does not reproduce the text of ISO 22000, ISO 19011, ISO 22003-1 or ISO/IEC 17021-1. It is not legal advice: food law is that of the place where the property operates.