WORKING MATERIAL 3.13 · CHAPTER 3 — THE INTERNAL AUDITOR'S LENS · SETTING: KRALENDIJK, BONAIRE

Walking the Pathway: Waste, Wastewater and Chemicals

Source: Francesco Dore, The Helm and the Lens, Volume 7b — GSTC Hotel Standard v4.0, subchapter 3.13 (book page 163)

GUIDING QUESTION

A register of waste contracts, safety data sheets and discharge tests can be complete and still describe only part of a hotel. Criteria D5 to D8 ask where wastewater, waste and chemicals actually go. How does an internal auditor move from the binder to the pipe, and what does she do when the two disagree?

1 · Verification Pact: market claims against the standard

Copied from the book. The last column is for your property: what holds here, and how you know it.

What is claimed	Binding?	What actually holds	In our property
A complete environmental register shows the hotel is in control of its discharges	Only partially true	It shows control of documented streams; only a site walk shows that all streams are documented	
Greywater from sinks and bars is harmless and outside D5	No	The criterion statement of D5 explicitly includes greywater	
A contract with a licensed collector covers all waste	Only partially true	D6.7 covers all waste not recovered on site; streams handed to others need their own pathway	
Safety data sheets kept in the office meet D7.1	Only partially true	The guideline asks that data sheets be accessible at or near points of use	
Only the authorities can identify pollution sources	No	D8.1 asks the hotel itself to identify sources based on its location and operational context	
A guest complaint about water quality is a matter for nature, not the hotel	No	The guideline to D8.1 incorporates guest feedback, and A8.3 asks for documented corrective action	

2 · Common mistakes — a self-check

Tick each mistake you recognise in your own property, and note where it shows.

☐ Auditing the register at the desk and never walking the site.

☐ Using a plumbing drawing that predates the latest changes to the building.

☐ Treating greywater from bars, sinks and showers as outside the scope of D5.

☐ Assuming that one waste contract covers every stream the hotel produces.

☐ Keeping all safety data sheets in a single office far from the points of use.

☐ Filing guest complaints about water, smell or noise without asking where they come from.

☐ Trying to judge legal compliance instead of recording the gap and referring it to the legal register.

☐ Walking only the buildings and ignoring the shoreline, boundaries and storm drains.

3 · A Checklist for Walking the Pathway

The book's checklist, with a column for your own answer.

Question	Why it matters	Our answer
Has the auditor read guest, staff and neighbour feedback before walking the site?	Feedback often points to the pathway the register has missed	
Is the plumbing drawing current, and who updates it after each change?	An outdated drawing hides every pathway added since it was made	
Does every stream, including greywater and backwash, have documented evidence of safe discharge?	D5 explicitly includes greywater, and D5.2 asks for evidence	
Who takes each waste stream away, and is the pathway legally authorised or recognised?	D6.7 applies to all waste not recovered on site	
Are safety data sheets at or near every point where chemicals are used?	The guideline to D7.1 places them where the risk is	
Has the hotel identified pollution sources specific to its location?	D8.1 asks for sources based on location and operational context	

4 · What would show this is working

Questions drawn from the subchapter's reading of the standard and its practical application. Indicator references point to the GSTC Hotel Standard v4.0; where the evidence lives is this book's practice, not a requirement of the standard.

Question	Where the evidence lives	Seen?
Is there documented evidence of safe discharge for every wastewater stream, including greywater (D5.2)?	Current, signed plumbing drawing; test results	☐
Is waste recorded by type per guest night or occupied room, and handed over through authorised pathways (D6.3, D6.7)?	Waste records; handler receipts for oil, batteries and hazardous items	☐
Is the harmful-substances inventory current, with safety data sheets at or near points of use (D7.1)?	Chemical inventory; observation of data sheets in stores	☐
Are staff who manage wastewater, waste and chemicals trained, with records (D5.4, D6.8, D7.5)?	Training attendance records	☐
Have pollution sources been identified, incorporating guest and stakeholder feedback (D8.1)?	Pollution-source review; guest comment cards	☐

> *What this sheet is not: the GSTC Hotel Standard does not prescribe this form. It is a working aid drawn from the book; the standard's criteria, indicators and guidelines govern the real case. Independent material; not affiliated with or endorsed by the GSTC. The standard's own text at www.gstc.org prevails.*