

IETA Comments to Washington Department of Ecology:

Carbon Management in Washington State Cap-and-Invest

26 June 2026

For more than 25 years, IETA has been the leading global business voice on robust market solutions to tackle climate change while driving clean finance at scale to realize the global goals of addressing climate change, like those embodied in the Paris Agreement. IETA represents a broad and diverse group of companies and businesses (300+ members worldwide) at the forefront of climate action. IETA's expertise is regularly called upon to inform carbon market solutions that deliver measurable climate outcomes, address economic competitiveness and carbon leakage concerns, balance efficiencies with social equity, and support a just transition.

IETA welcomes the opportunity to respond to Washington State's Department of Ecology's (ECY) solicitation of input on integrating engineered Carbon Capture, Removal, Utilization, and Storage (CCRUS) within the framework of the Washington Cap-and-Invest Program (henceforth referred to as "C&I"). We greatly appreciate ECY's willingness to engage with stakeholders to scale-up this necessary component of the state's climate goals. IETA's input is structured around the following overarching sections:

1. Introduction
2. IETA Geostorage and Carbon Crediting Handbook (Version 2.0)
3. Detailed Responses to Solicitation Questions
4. Conclusion
5. Annex: Summary Table from IETA Geostorage and Carbon Crediting Handbook

Section 1: Introduction

Brought about in part by geopolitical and macroeconomic conditions outside of its control, IETA recognizes there are new pressures and challenges facing Washington as the state continues to implement several pioneering climate policies. IETA greatly values ECY's continued leadership on these matters and realizes that the significance of these efforts is truly global.

We believe that a CCRUS Program under C&I can be the first-of-its-kind to drive market-based climate action. IETA applauds Washington's understanding of the role CCRUS technologies must

play in reaching its 2045 climate neutral goal. To most effectively, efficiently, and safely roll-out such technology (and climate programs in general), ensuring harmonization across policies is critical, including, but not limited to, C&I and the Clean Fuel Standard (CFS). These policies can help Washington affordably reach climate commitments, drive sustainable economic growth, and unlock new domestic and international market opportunities.

Noting the carbon market linkage agreement signed between Washington, California, and Québec market and the ongoing implementation of California's CCUS program under SB 905, IETA believes this is a prime opportunity to launch thoughtful conversations and engagement around CCRUS in C&I.^{1,2} Doing so would provide clarity and certainty for obligated entities and stakeholders, while ensuring the maintenance of a liquid market supporting the efficient allocation of resources and capital.

IETA strongly believes that the integration of CCRUS into C&I could serve as an important market signal to stakeholders in carbon management. ECY can support project development, stimulate financial pathways, and provide standardized reporting mechanisms, while facilitating CCRUS deployment across sectors. Otherwise, a fragmented regime could stifle necessary investment and development.

As ECY continues to work through feedback and comments on CCRUS integration into C&I, IETA's global membership stands ready to lend support. We welcome future opportunities to inform and/or convene deeper dives with ECY and, where relevant, leverage our global expertise to think through design, functionality and affordability elements within the Washington context.

Section 2: IETA Geostorage and Carbon Crediting Handbook (Version 2.0)

IETA recommends ECY highly leverage Version 2.0 of IETA's [Geostorage and Carbon Crediting Handbook](https://www.ieta.org/geostorage-and-carbon-crediting-2-0).³ Released in September 2025 during New York Climate Week, the handbook is a comprehensive synthesis of methods and safeguards on the crediting of greenhouse gas reductions and removals involving geological storage of carbon dioxide (primarily CCS, DACCS, and BECCS).

As Washington continues to consider CCRUS integration into C&I, IETA highlights that this work to support, develop, and regulate **CCUS activities are of growing importance around the world**. The

¹ <https://apps.ecology.wa.gov/publications/summarypages/2614018.html>

² <https://ww2.arb.ca.gov/our-work/programs/carbon-capture-and-sequestration/ccs-meetings-workshops>

³ <https://www.ieta.org/geostorage-and-carbon-crediting-2-0>

UK announced in July 2025 it will legislate and fully integrate greenhouse gas removals (GGRs) into the UK Emission Trading System by the end of 2029, with a detailed analysis of what that integration will look like.⁴ Similarly, Canada accepted comments for a draft federal DACCS offset protocol⁵ with plans to implement a BECCS protocol,⁶ and the European Union finalized three removals types under its Carbon Removals and Carbon Farming (CRCF) Regulation.⁷

More broadly, the Handbook's review and analysis covers thirteen (13) total standards:

- **Six (6)** independent crediting programs;
- **Five (5)** domestic crediting/quantification programs; and
- **Two (2)** international crediting/quantification methodologies.

This go-to reference acts as a source for practitioners and policymakers seeking to understand current practices, commonalities and differences in scope, expectations and approaches for **methodological design, safeguards, measurement, reporting and verification (MRV) and accounting for CCS and engineered CDR.**

The Handbook includes a summary table (**included as Annex 1 to this response**) highlighting the scope, coverage and approaches within the current GCS standards ecosystem is provided. Safeguarding and accounting principles, precedents and practice for GCS established under the UNFCCC, Kyoto Protocol and the Paris Agreement are also reviewed and assessed, while also highlighting important linkages between methodologies, safeguards and accounting for GCS operations and the origination and trading of credits in the era of the Paris Agreement.

⁴ <https://www.gov.uk/government/consultations/integrating-greenhouse-gas-removals-in-the-uk-emissions-trading-scheme>

⁵ <https://www.canada.ca/en/environment-climate-change/services/climate-change/pricing-pollution-how-it-will-work/output-based-pricing-system/federal-greenhouse-gas-offset-system/protocols/direct-air-carbon-dioxide-capture-geological-storage/preliminary-draft.html>

⁶ <https://www.canada.ca/en/environment-climate-change/services/climate-change/pricing-pollution-how-it-will-work/output-based-pricing-system/federal-greenhouse-gas-offset-system/protocols.html>

⁷ https://climate.ec.europa.eu/news-other-reads/news/eu-sets-worlds-first-voluntary-standard-permanent-carbon-removals-2026-02-03_en

Section 3: Detailed Responses to Solicitation Questions

IETA responds to specific questions asked in ECY [concepts for potential regulations document](#).⁸

Feedback Area 1: Carbon management within the Cap-and-Invest Program

- 1. Which engineered carbon management pathways do you think present the greatest opportunity for Cap-and-Invest Program compliance? For example, point source carbon capture and storage, carbon capture and utilization, and technological carbon dioxide removal. Why?*

IETA supports a broad array of project category types and designs that will need to be enabled and scaled through policies and strategies implemented through the C&I CCRUS Program and elsewhere. Recognizing the existing rule language around permanent sequestration, we believe this includes point source CCS, CCU, and tech-based CDR – long-lasting sequestration pathways we strongly support – but also natural climate solutions, for which the permanence requirements can be met through contracted durability and other related mechanisms (see Question 7 for more information). Rather than restricting investment in certain pathways and technologies at the expense of others, a technology-neutral policy and regulatory approach that keeps an eye to existing and emerging CDR pathways rightfully encourages innovation and cost-competitiveness across the board. Doing so will continue to showcase Washington’s leadership in pursuing a net-zero strategy that encourages investment in the broadest range of necessary CCRUS strategies.

- 2. What additional clarity is required for effective deployment of engineered carbon management for Cap-and-Invest Program compliance? What is the most important? What is the most pressing?*

IETA encourages ECY to utilize existing standards, best practices and best available science to inform its next steps in the implementation of its CCRUS Program. This would streamline the entry of CCRUS stakeholders into the Washington C&I market, minimize compliance and regulatory costs, and improve project viability.

Our members find the UIC Class VI program, developed by the U.S. EPA with extensive scientific input, to be a comprehensive, risk-based framework for ensuring that geologic storage projects

⁸ https://ecology.wa.gov/getattachment/d5ac02c7-e37f-41fe-b5f3-3014b38ec3b5/WA-ECY_carbon-management_public-comment-questions.pdf

protect public health, drinking water, and the environment. Recognizing that the CCRUS Program must establish a rigorous, protective regulatory framework for geologic CO₂ storage, where Washington proposes to exceed the rigorous UIC Class VI baseline, there should be a clear safety or environmental rationale for doing so.

Beyond US-based frameworks, IETA also encourages usage of our Handbook for Geostorage and Carbon Crediting. The Handbook covers methodological safeguards from across leading government regulators and global independent crediting programs (See Section 2 and Annex 1).

3. Do you have any specific questions regarding the treatment of different carbon management pathways under the Cap-and-Invest Program?

IETA advocates for consistency in the regulatory requirements for the emissions exemption and offsets pathways. We are concerned by the risk of double counting under both pathways with differing boundary conditions and value chain accounting approaches. For example, energy use by DACCS facilities could be subject to C&I compliance. Another risk is that compliance entities use point-source carbon capture to minimize their participation in C&I, undermining the market. We encourage ECY to maintain consistency in the regulatory framework for all CCRUS activities and to clarify the accounting boundaries between the two pathways

Feedback Area 2: Carbon management in Washington

4. Do engineered carbon management pathways present a feasible decarbonization strategy for companies/facilities in Washington? For example, point source carbon capture and storage, carbon capture and utilization, and technological carbon dioxide removal. Why? Why not?

IETA believes that engineered carbon management is an essential component of net-zero strategy. Many Washington companies/facilities may have residual emissions that cannot be eliminated, and CCRUS can help mitigate these emissions. Point-source CCS and CDR are reliable technologies with a proven track record, and there is strong potential for high-integrity use with C&I. Integrating CCRUS within C&I will catalyze the development of the industry within Washington.

IETA consistently advocates for a portfolio of market-based solutions (including engineered carbon management) to achieve net-zero emissions. We reiterate our support for a technology-neutral

approach and encourage ECY to allow for the development of various engineered carbon management strategies.

5. What are the greatest obstacles to implementing engineered carbon management in Washington and how can the state remove those barriers?

Currently, there is a fragmentation of standards around Monitoring Reporting, and Verification (MRV), safeguards, and accounting for carbon management projects, as can be seen in the annexed summary table. IETA encourages ECY to adopt practical and implementable standards drawing on best practices from jurisdictions and Independent Crediting Programs across the world, with special emphasis on Class VI regulations to ensure national consistency.

Feedback Area 3: Implementation of the CCA Program Rule

6. Which sequestration and/or mineralization approaches might meet this definition of permanent sequestration? Why?

The [IPCC Special Report on Carbon Capture and Storage](#) (2005) states, "Observations from engineered and natural analogues as well as models suggest that the fraction retained in appropriately selected and managed geological reservoirs is very likely to exceed 99% over 100 years and is likely to exceed 99% over 1,000 years. For well-selected, designed and managed geological storage sites, the vast majority of the CO₂ will gradually be immobilized by various trapping mechanisms and, in that case, could be retained for up to millions of years" (p. 14).⁹

This conclusion provided the foundations for the development of regulatory frameworks for carbon storage in USA, Canada, the EU and Australia among others. These frameworks seek to ensure appropriate selection of sites and set down requirements for in respect of them being well-designed and well-operated.

Therefore, IETA believes that several established sequestration and mineralization approaches meet ECY's definition of permanent sequestration. We encourage ECY to be non-prescriptive and focus on the steps and procedures within a regulatory framework that allow for appropriate selection, design and management of storage sites to give assurance for long-term permanence. For what can be considered less durable solutions, ECY can backstop the risk of reversal through contracted

⁹ https://www.ipcc.ch/site/assets/uploads/2018/03/srccs_wholereport-1.pdf

durability, which can include mechanisms such as buffer pools, project-level insurance, etc. The Beyond Alliance, RMI, and the American Forest Foundation published a [detailed paper](#) on contracted durability in June 2026, assessing the impacts of these mechanisms and exploring how risk-adjusted durability guarantees can be integrated into active policy and standard-setting processes.¹⁰ We encourage ECY to refer to this paper to design carbon management standards that support broad CDR pathway inclusion while maintaining robust, statutory permanence standards.

7. How can and should elements such as monitoring and verification procedures and risk mitigation, compensation, financial assurance, and reversal provisions be factored into Ecology's implementation of the CCA program rule?

These elements are vital ingredients of an appropriate regulatory framework that provides long-term confidence in permanent storage, reduces moral hazards, and builds confidence in carbon management technology. We encourage ECY to carefully examine how these elements are addressed in the Class VI well rule, and to ensure that they are applied to all carbon management projects in Washington, regardless of CO2 source or pathway (emission exemption or offsets).

Beyond US-based frameworks, IETA also encourages usage of our Handbook for Geostorage and Carbon Crediting. The Handbook covers methodological safeguards from across leading government regulators and global independent crediting programs (See Section 2 and Annex 1).

- 8. How might federal Class VI well or other applicable state or federal standards be leveraged?*
9. What other methodologies or protocols related to geologic sequestration and/or mineralization should Ecology look at?

As previously mentioned, IETA encourages ECY to rely on the EPA's UIC Class VI program as a baseline regulatory framework. This would ensure uniformity for CCRUS project developers active across the country and limit barriers to entering Washington C&I.

We would also note that CARB is currently implementing [SB 905](#) to develop a California CCUS Program. CARB recently released a document on the [Concepts for Potential Regulations](#), and we encourage ECY to collaborate with CARB to maintain consistency for CCUS regulations across the two states, given impending linkage between California and Washington's carbon markets.¹¹ At a

¹⁰ <https://rmi.org/resources/contracted-durability-a-framework-for-performance-based-carbon-removal/>

¹¹ https://ww2.arb.ca.gov/sites/default/files/2025-08/905_solicitation_Aug2025_0.pdf

high level, CARB is following the strategy of using the EPA Class VI regulations as a base while adding California-specific requirements, which we encourage ECY to emulate.

We recommend that ECY consider other subnational and international regulations detailed in the [Geostorage and Carbon Crediting Handbook](#), including those in Alberta, the EU and the UK. These regulations illustrate how CCRUS can be integrated within a broader compliance carbon market and can inform ECY's approach.

10. As Ecology works to provide clarity on the CCA Program Rule implementation, what strategies could mitigate potential harms to communities and Tribes?

IETA encourages ECY to align with existing rules on harm mitigation for major infrastructure projects in the State. A good example is the State Environmental Policy Act, which would require environmental review, public participation, and consideration of project impacts for most CCRUS projects. Separately, there are several risk assessment elements and procedures covered in Class VI regulations that ECY could adopt. One of the Class VI requirements is an emergency response remedial plan (ERRP) which mandates operators to maintain detailed procedures for CO2 leakage risk and a traffic light system (TLS) to manage seismicity.

Section 4: Conclusion

We greatly appreciate this opportunity to provide feedback to ECY on integrating CCRUS within C&I. IETA believes that this consultation is an opportunity to harmonize and ensure consistent implementation of this necessary component of the state's carbon neutral climate goal. We look forward to continuing to engage with ECY as implementation unfolds.

Annex 1: Summary Table from IETA Geostorage and Carbon Crediting Handbook

See the following three pages for the summary table included in Version 2.0 of IETA's [Geostorage and Carbon Crediting Handbook](#), which was released in September 2025. The table provides a detailed synthesis of current methodologies and protocols related to geological CO₂ storage activities, spanning compliance and voluntary programs and standards around the world.

STANDARD SETTER			SOURCE COVERAGE, SCOPE AND STRUCTURE						STORAGE COVERAGE					
Name	Type	Purpose	CCS	DACCS	BECCS	WtECCS	Jurisdiction	Modular	Saline Aquifer	Depleted O&G fields	EOR	In situ mineraliz'n	Sub-seabed	Geostorage Regulation
ACR	ICP	C	✓	✓	—		US, CA		—	—	✓			LP (US Class II/VI or CA equiv)
Verra/VCS	ICP	C	—	✓	✓	✓	Global	✓	✓	✓				LP + TG (GCS Requirements)
GCC	ICP	C	✓	✓	✓	✓	Global		✓	✓	✗			LP(g) + TG (GCC CO2 Geo Guidance)
Gold Standard	ICP	C			✓		Global		✓	✓	✗	—	✗	LP(g) + TG (GS4GG Tool 03)
Puro.Earth	ICP	C		✓	✓	✓	Global		✓	✓	✗	✓		LP + LG (Table 1)
Isometric	ICP	C		✓	✓	—	Global	✓	✓		✗	✓		LP + TG (CO2 Storage Modules)
Env & Clim Change Canada (ECCC)	Govt. (Dom.)	C		✓			CA		✓	✓	✗	✓		LP (Provincial permit)
Alberta	Govt. (Dom.)	C	✓	✓	✓		AB		✓	✓	✓			LP (AB D065)
British Columbia	Govt. (Dom.)	C	✓	✓			B.C.		✓	✓	✓			LP (B.C. OGAA, PNGA, ERAA)
European Union (EU)	Govt. (Dom.)	Q		✓	✓	✓	EU-27		✓	✓	✗	—		LP (MS Storage Permit)
British Stds Inst (BSI)	Govt. (Dom.)	Q		✓	✓	✗	UK (primary)		✓	✓		—		LP (UK Storage Permit)
Clean Dev Mech (CDM)	Govt. (Intl.)	C (old)	✓				Non-Annex I (Developing) Country		✓	✓	✓			LP + LG (Participation Requirements)
IPCC	Govt. (Intl.)	Q (NGHGI)	✓	○	✓	✓	Global	○	✓	✓	✓			LP + TG (QA/QC checks)

Acronyms and abbreviations - Pg 49

✓ Covered ○ Partially Covered — Under Consideration; Unclear ✗ Explicitly Excluded

Annex 1: Summary Table from IETA Geostorage and Carbon Crediting Handbook

METHODOLOGICAL APPROACHES						PROJECT EMISSIONS COVERAGE ACROSS THE LIFECYCLE & SUPPLY CHAIN						LEAKAGE ESTIMATION/ MITIGATION COVERAGE		
Name	Lifecycle emissions	Additionality	Baseline	Reversals	Long-term monitoring	Construct. emissions	Land use change	Decomm. emissions	Materials consumed	Waste disposal	Monitoring emissions	Biomass sourcing	Energy sourcing	Materials sourcing
ACR	✗	RS, PS	P / S	B*, R (≤10%)	LTM-HC	○			—			—		
Verra/VCS	✓	RS, FA, CP	P, LUC (R/NB)	B(r) (d) (≤7%)	LTM-HC (o/i)(r)	✓		✓	✓	✓		✓	✓	✓
GCC	○	RS, FA, CP (TOOL 01)	P / S (R/NB)	B (5%)	LTM-HC				✓			○		
Gold Standard	○	RS, FA, CP (TOOL 01/02)	P / S, LUC	B(r) (2.5-8.5%)	LTM-HC (o/i)	✓	✓	✗	✓			○		
Puro.Earth	✓	RS, FA	P, LUC (R/NB)	CC, R	LTM-HC	✓	✓	✓	✓	✓	✓	✓	✓	✗
Isometric	✓	RS, FA, CP, PS	P, CS (R/NB)	B(r) (d) (2%)	LTM-HC	✓	✓	✓	✓	✓	✓	✓	✓	✓
Env & Clim Change Canada (ECCC)	✓	RS	P	"B (3%)"	LTM-HC	○		✗	✓		✓		✓	
Alberta	○	RS (TIER/Flex)*	P	CC (d) (0.5-1%)	LTM-HC	○		✗	✓	✓				
British Columbia		RS, FA, PA	P (zero)	B(r) (≤16.44%)	LTM-HC									
European Union (EU)	✓		P (zero)	B*	LTM-HC	✓		✓	✓	✓		✓	✓	
British Stds Inst (BSI)	✓		P	B*	LTM-HC	✓	✓	✓	✓	✓		✓	✓	—
Clean Dev Mech (CDM)		RS, FA, CP (TOOL 01/02)	P / S	B (5%)	LTM-HC (o)									
IPCC					LTM-HC									

Acronyms and abbreviations - Pg 49

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Annex 1: Summary Table from IETA Geostorage and Carbon Crediting Handbook

TABLES ON Pg 12-13

ICP	Independent crediting programme
C	Crediting (estimating net removal for purposes of issuing carbon credits)
Q	Quantification (estimating net carbon removal, which could form the basis for issuance of carbon credits)
LP	Local permit (requires a dedicated CO2 geostorage permit [e.g. US EPA Class VI, EU CCS Directive, Canadian Provincial laws etc or equivalent]). MS = Member State of the EU, aligned with EU CCS Directive requirements
LP + TG	Local permit + Technical guidance (requires a dedicated CO2 geostorage permit meeting technical guidance provided in the standard). (g) denotes that a general permit is allowed if issuance is based on the use of information aligned with the provided technical guidance.
LP + LG	Local permit + Legal guidance (requires a dedicated CO2 geostorage permit, issued according to the legal guidance/checklist provided in the standard)
RS	Regulatory surplus test.
FA	Financial additionality test.
CP	Common practice analysis.
PS	Performance standard test (environmental or technical)
P	Projection-based (i.e. assumed that captured and injected CO2 would otherwise be emitted or remain in atmosphere - often correlated with historical emissions/removals)
S	Standards-based (i.e. emissions absent of the project activity estimated using a benchmark providing similar product or service)
R/NB	Retrofit or new-build modifies baseline scenario and emission requirements (e.g. retrofit means supply chain emissions exist in the baseline)
LUC	Land use change effect to be considered in the baseline accounting for the carbon storage in an undisturbed site (for NB sites). Similar to counterfactual storage (CS). LUC emissions to be counted in construction emissions.
CS	Counterfactual storage (quantification of the CO2 removal and storage that would have taken place without the project's activity, assuming the baseline scenario)
B	Buffer reserve (withholding of credits in a dedicated account [e.g. ECCC Environmental Integrity Account; ERT Reserve] to be called upon and units cancelled in the event of a carbon reversal) (r) denotes that the buffer contribution based on a risk rating/risk assessment. (d) denotes that a discount factor is applied to address uncertainty or reversals (e.g. Verra/VCS 'Identification and Assessment of Uncertainties'; Isometric 'Conservative estimate of Removals'; AB portion 'retired to atmosphere'). Discount factor applies in addition to buffer contributions, where relevant. Figures in parenthesis are indicative estimates of the percentage buffer contributions from issued credits. Discount factors would be additional to the buffer contributions. * National geostorage regulations implementing financial mechanisms may incorporate a separate buffer reserve or allow for other forms of insurance against reversal risk.
R	Replacement obligation (of equivalent units; e.g. Section 6.7.5.3 of Puro Standard, v4.2)
CC	Credit cancellation (where reversals occur after injection has ceased but no liability transfer has been enacted). Absence of buffer means that the credits must be acquired (e.g. from market, insurer)
LTM-HC	Liability transfer and long-term monitoring by the state/host country, implying liability for reversals through monitoring of emissions from storage. (o/i) denotes that the ex ante acceptance of, or the transfer of, liability for CO2 storage site monitoring and remediation to the host country may be optional or is implied rather than prescribed. (r) denotes that the absence of a liability transfer process negatively impacts upon assessed risk.

ACRONYMS AND ABBREVIATIONS

A6.4ER	Article 6.4 emission reduction (tradable unit)
AEPA	Alberta Environment and Protected Areas
BECCS	Bioenergy with carbon capture and storage
BTR	Biennial Transparency Report
CCGS	CO2 capture and geological storage (from 2006 IPCC Guidelines)
CCS	Carbon dioxide (CO2) capture and storage
CEEU	CORSIA Eligible Emissions Unit
CMA	Conference of the Parties serving as the meeting of the Parties to the Paris Agreement
CMP	Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol
COP	Conference of Parties to the UNFCCC
CORSIA	Carbon Offsetting and Reduction Scheme for International Aviation
CRCF	Carbon Removal and Carbon Farming certification regulation (EU)
DAC	Direct air capture
DACCS	Direct air carbon capture and storage
eCDR	Engineered carbon dioxide removal
EOR	Enhanced oil recovery
ETF	Enhanced transparency framework (Paris Agreement)
GCC	Global Carbon Council
GCS	Geological CO2 storage
GHG	Greenhouse gas
IMP	International mitigation purposes (Article 6)
IPCC	Intergovernmental Panel on Climate Change
ITMO	Internationally transferred mitigation outcome (tradable unit)
LT-LEDS	Long-term low emissions development strategies
M&P	Modalities and procedures
MPGs	Modalities, procedures and guidelines for the ETF
MRV	Measurement, reporting and verification
NDC	Nationally determined contribution
NGHGI	National GHG inventory or anthropogenic emissions by sources or removals by sinks
OIMP	Other international mitigation purposes (Article 6)
RMPs	Rules, modalities and procedures (Article 6.4)
SBM	Article 6.4 (PACM) Supervisory Body
UNFCCC	United Nations Framework Convention on Climate Change
VCM	Voluntary carbon market
VCS	Verified carbon standard
VVB	Validation and verification body