

IFRS[®] Taxonomy 2018— Proposed Update 2 *General Improvements*

Comment letter analysis

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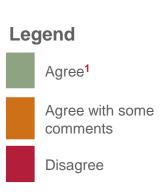
Background

- Proposed Update (PTU) 2 *General Improvements* was published on 6 December 2018. The comment letter period ended on 4 February 2019.
- We received comment letters from:
 - Global Financial Reporting Collective (GFRC); and
 - Toppan Merrill.



Overview of feedback

	GFRC	Toppan Merrill	PTU paragraph	Slides
A. Improving data quality				
 Introducing implementation notes in the IFRS Taxonomy to provide additional guidance to preparers 	Agree	Agree	17-20	
1.1. Adding implementation notes to clarify which sign to use	Agree	Agree	21-30	4-12
Assigning balance attributes	Disagree	Agree	31-34	13-17
Changing element type to 'per share'	Agree	Agree	35-39	
1.2. Identifying a technical approach to implementation notes	Agree	Agree	40-43	
 Improving the IFRS Taxonomy elements for tagging time periods—introducing the 'duration' element type 	Agree	Agree	44-51	18-20
 Improving the IFRS Taxonomy elements for tagging useful live and depreciation or amortisation rates 	s Disagree	Agree	52-60	21-24
 Improving the IFRS Taxonomy elements for tagging contingent consideration and indemnification assets in business combinations 	Agree	Agree	61-65	25-28
B. Making the IFRS Taxonomy easier to navigate				
1. New presentation group for all axes and members		Agree	66-72	29-31
2. Removing entry points without documentation labels	Agree	Disagree	73-76	32-33
Other feedback				34-36
¹ The subsequent slides do not include further analysis on proposals the For details on those proposals, please refer to the <u>PTU</u> .	at respondents a	igreed to with	out comments.	





Adding implementation notes to clarify which sign to use



Adding implementation notes to clarify which sign to use—background and proposal

- We had received feedback that many common data errors in XBRL fillings are related to the incorrect use of signs (positive or negative).
- To indicate the sign to be used, the IFRS Taxonomy (and other XBRL taxonomies) use the following modelling features:
 - Monetary line items are assigned a balance attribute of debit or credit, where possible. This assignment generally results in elements having positive signs in an XBRL filing. For example, the 'Operating expense' element has a debit attribute in the IFRS Taxonomy and a positive sign in an XBRL filing.
 - Standard element labels of line items are used to understand whether the sign should be positive or negative, in particular for elements such as 'Profit (loss)' or 'Net cash flows from (used in) investing activities'. In the case of 'Profit (loss)', a negative sign is used in an XBRL filing if the preparer reports a loss in its financial statement.
- There are 155 monetary IFRS Taxonomy elements that do not have a balance attribute. For many of those elements, we proposed adding implementation notes to explain to preparers when to enter a positive or negative value.



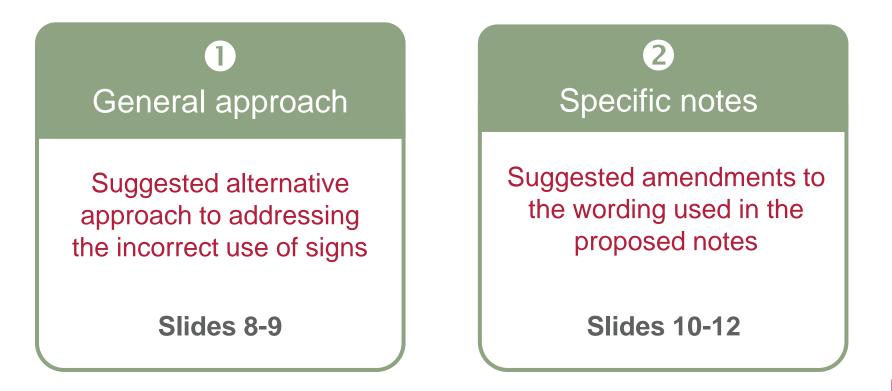
Adding implementation notes to clarify which sign to use—proposal

• We proposed adding two different implementation notes:

	Proposed implementation note	Reason for adding an implementation note
Elements that normally have a positive value (87 elements)	'A positive XBRL value should normally be entered for this element (unless used with certain members; see the IFRS Taxonomy formula linkbase or the IFRS Taxonomy formula guide for a list of members).'	Even though the IFRS Taxonomy formula linkbase provides automatic validation for these elements, in our view, it is helpful to add implementation notes. This is because not all tagging software tools use the IFRS Taxonomy formula linkbase.
Elements that can have a positive or negative value (17 elements)	'A positive or negative XBRL value can be entered for this element. Refer to the standard label to determine the correct sign. Use a negative value for terms in brackets.'	Such a note would emphasise that the standard label should be used to determine the correct sign to use.

Adding implementation notes to clarify which sign to use—overview of feedback

- GFRC strongly supported using implementation notes in the IFRS Taxonomy. They said that it would lead to more consistent and accurate tagging and fewer extensions.
- However, they provided two sets of comments on this proposal:





Adding implementation notes to clarify which sign to use—general approach: feedback

- GFRC said that they would *prefer* dealing with the incorrect use of signs differently.
 - Their preference is to model based on a principle of assigning only positive signs to IFRS Taxonomy elements, with exceptions for elements whose values naturally fluctuate around zero (for example, derivatives as they go in and out of money).
 - For such exceptions, they prefer creating two, separate elements and assigning positive signs to both elements (as opposed to using one element supported with implementation notes, as proposed in the PTU). In their view, their suggestion would make calculations easier because users can determine whether to add or subtract a value based on the element label.



Adding implementation notes to clarify which sign to use—general approach: staff response

- The staff thinks the suggestion to change the modelling for IFRS Taxonomy elements is outside the scope of this update. Consequently, the staff recommends retaining the proposals. The staff notes that:
 - most IFRS Taxonomy elements (about 70%) generally result in a positive sign in an XBRL filing.
 The IFRS Taxonomy Formula automatically checks the sign reported for such elements.
 - separate elements to indicate signage would burden preparers with retagging costs and users with re-mapping costs for analysing various elements. This is because:
 - ➢ the sign used for a line item could change from one period to another. For example, because financial instruments could be assets or liabilities and cash flows could be inflows or outflows.
 - when members are used with a line item, the reported sign could change. For example, when disaggregating 'profit(loss)' by segments, one segment could be profitable whereas the other could be loss-making. Using separate elements would not be useful and would make it more difficult to reconcile the disaggregation to the total 'profit(loss)'.
 - relying on the balance attribute and standard element label is consistent with the approach followed in other major taxonomies for similar elements.



Adding implementation notes to clarify which sign to use—specific notes: feedback and staff response

- Feedback
 - GFRC expressed concerns that as written, the implementation note for elements that are normally expected to have a positive value is not helpful [implementation note #1 on slide 6]. This is because it refers to supporting materials outside the IFRS Taxonomy for the list of members that could change the normal sign.

Staff response

- We considered two options:
 - Option 1: retaining the proposed implementation note, with some minor amendments;
 - **Option 2:** changing the proposed implementation note to include all the members that could cause a sign reversal.
- Though not directly related to the feedback, the staff thinks that the implementation note as proposed could be incorrectly interpreted to mean that only a negative sign should be reported if the line item is used with those members. Consequently, under Option 1, we suggest making editorial changes:

A positive XBRL value should normally be entered for this element. (unless <u>A negative XBRL</u> value may need to be entered if this element is used with certain members.; <u>sSee</u> the IFRS Taxonomy formula linkbase or the IFRS Taxonomy formula guide for a list of members).

Adding implementation notes to clarify which sign to use—specific notes: illustration

Option 1: Retaining the proposal

name	ifrs-full:DepreciationPropertyPlantAndEquipment	
	A positive XBRL value should normally be entered for this element. A negative XBRL value may need to be entered if this ele ment is used with certain members. See the IFRS Taxonomy formula linkbase or the IFRS Taxonomy formula guide for a list of members.	

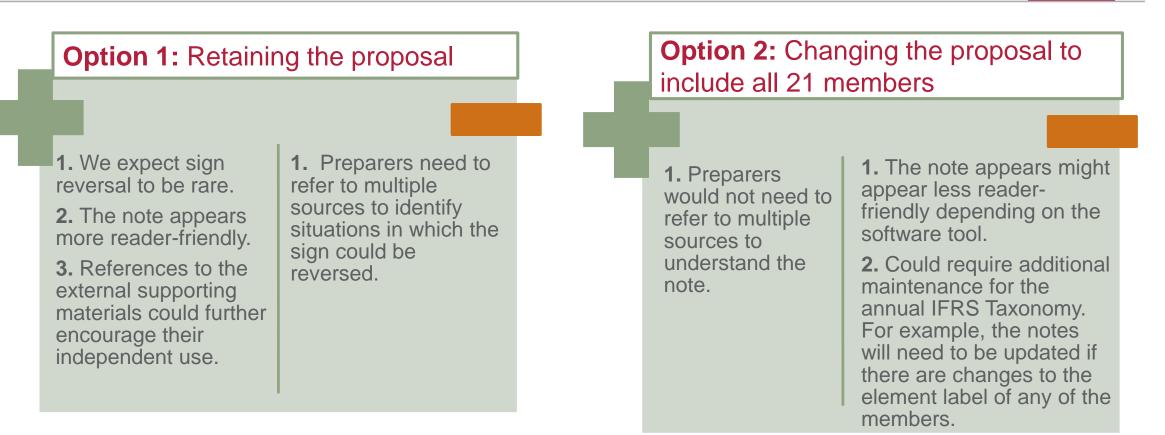
Option 2: Changing the proposal to include all 21 members

name ifrs-full:DepreciationPropertyPlantAndEquipment

A positive XBRL value should normally be entered for this element. A negative XBRL value may need to be entered if this ele ment is used with the members referenced. [Refer: Increase (decrease) due to changes in accounting policy and corrections o f prior period errors [member]; Increase (decrease) due to changes in accounting policy [member]; Increase (decrease) due to changes in accounting policy required by IFRSs [member]; Increase (decrease) due to voluntary changes in accounting policy [member]; Increase (decrease) due to corrections of prior period errors [member]; Accumulated depreciation, amortisation and i mpairment [member]; Effect of transition to IFRSs [member]; Redesignated amount [member]; Aggregate adjustment to carryin g amounts reported under previous GAAP [member]; Material reconciling items [member]; Elimination of intersegment amounts [member]; Increase (decrease) due to departure from requirement of IFRS [member]; Treasury shares [member]; Risk diversifica tion effect [member]; Reinsurer's share of amount arising from insurance contracts [member]; Present value of defined benefit obligation [member]; Plan assets [member]; Effect of asset ceiling [member]; Accumulated depreciation and amortisation [mem ber]; Accumulated impairment [member]; Increase (decrease) due to application of IFRS 15 [member];]



Adding implementation notes to clarify which sign to use—specific notes: staff response



The staff recommends option 2 because we think it will help preparers better avoid tagging errors. The additional maintenance required would not be significant.



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Assigning balance attributes



Assigning balance attributes—proposal

• We proposed assigning a balance attribute to all the elements in the table below and changing the element labels for some to further clarify the correct sign to use.

Current element label	Proposed element label	Proposed balance attribute
Financial forecast of profit or loss for cash- generating unit, significant unobservable inputs, assets ²	Financial forecast of profit (loss) for cash-generating unit, significant unobservable inputs, assets	Credit
Financial forecast of cash flows for cash- generating unit, significant unobservable inputs, assets ²	Financial forecast of cash inflows (outflows) for cash-generating unit, significant unobservable inputs, assets	Debit
Current estimate of future cash outflows to be paid to fulfil obligation, significant unobservable inputs, assets ²	No change	Credit
Estimated financial effect of contingent assets	No change	Debit
Estimated financial effect of contingent liabilities	No change	Credit
Estimated financial effect, contingent liabilities in business combination	No change	Credit

² Similar elements exist for liabilities and own equities. The proposal applied to all three elements.



Assigning balance attributes—feedback

- GRFC disagreed with the proposals to assign balance attributes to some of the elements because the values tagged using those elements are not recognised in the primary financial statements. They added that the:
 - first three elements on slide 14 reflect unobservable inputs into a valuation model used to estimate fair value. Therefore, these elements are only inputs into the value accounted for in a financial system.
 - last three elements on slide 14, contingent assets are not yet part of the recognition system and contingent liabilities cannot be measured reliably. However, they acknowledged that there is a stronger case to assign balance attributes to these elements than to the first set of elements.



Assigning balance attributes—staff response

- The staff recommends retaining the proposals because we think our arguments are still valid.
- As mentioned in the PTU, we assign balance attributes to IFRS Taxonomy elements to help preparers determine the correct sign for the XBRL value. We think, therefore, that the balance attributes need not exactly reflect the amounts in the accounting systems.
- In addition:
 - assigning a balance attribute is consistent with the approach followed for other monetary IFRS Taxonomy elements not recognised in the financial statements.
 - as mentioned in the PTU, we proposed changing the elements relating to unobservable inputs from line items to members in the <u>IFRS 13 Common Practice PTU</u>. As those proposed changes are now being finalised, we will not assign balance attributes to those elements—balance attributes are not applicable to members because they can only be used with line items.



Assigning balance attributes—additional feedback and staff response

- Additional feedback
 - GFRC did not support the reason as to why balance attributes cannot be assigned for IFRS Taxonomy elements that have a natural accounting balance but can have a debit or credit balance attribute.

'Depreciation, property, plant and equipment'—this element has a debit balance attribute when presented in the statement of profit or loss, but has a credit balance attribute when used in a reconciliation of the carrying amount of property, plant and equipment.

In their view, a reconciliation is not part of the double entry accounting system. They said that we should create two separate elements for 'Depreciation, property, plant and equipment' (one element to express the expense in profit/loss and the other element to use in the reconciliation).

• Staff response

- The objective of this set of proposals is to provide guidance to preparers for elements that cannot be assigned balance attributes.
- Devising a different modelling approach falls outside the scope of this update and would need to be considered separately and go through public consultation.



Improving the IFRS Taxonomy elements for tagging time periods introducing the 'duration' element type



Introducing the 'duration' element type background and proposal

- The IFRS Taxonomy currently uses the 'decimal' element type for seven elements that represent periods of time (see table below). The 'decimal' element type does not have a predetermined unit type in XBRL. Consequently, preparers have the flexibility to specify the unit, thereby resulting in diversity in practice.
- We proposed creating new line items for those elements using the 'duration' element type and deprecating the existing line items using the 'decimal' element type.

Element standard label

Actuarial assumption of life expectancy after retirement

Actuarial assumption of retirement age

Remaining amortisation period of intangible assets material to entity

Remaining recovery period of regulatory deferral account debit balances

Remaining reversal period of regulatory deferral account credit balances

Weighted average duration of defined benefit obligation

Weighted average remaining contractual life of outstanding share options

Introducing the 'duration' element type feedback and staff response

- Feedback
 - GFRC and Toppan Merrill questioned whether the element—Actuarial assumption of retirement age—should use the 'duration' element type. In their view, this element represents the *point in time* when cash outflows commence for a particular employee and not a period of time.
 - While GFRC does not disagree with this proposal if it provides consistency in the reported unit, Toppan Merrill said that using the 'Decimal' element would be more appropriate.
- Staff response
 - As mentioned in the PTU, our review of IFRS filings shows that there is diversity in the units preparers use and that the units used are not always sufficiently clear. Additional research on the element in question showed that while about half of the financial statements analysed used 'age', others used a mix of 'Y', 'years', 'year' with a few not reporting the unit at all.
 - Consequently, the staff recommends retaining the proposal to use the 'duration' element type in order to get better consistency in how the units are reported.



Improving the IFRS Taxonomy elements for tagging useful lives and depreciation or amortisation rates



Tagging useful lives and depreciation or amortisation rates—background and proposal

- The IFRS Taxonomy uses the 'text' element type for elements that represent disclosure of useful lives or of depreciation/amortisation rates used for property, plant and equipment, intangible assets, investment property, and biological assets.
- We proposed creating new separate line items for each element and:
 - using the percentage line item for the depreciation/amortisation rates;
 - creating three line items for useful lives to represent the different ways in which useful lives can be reported.

Proposed element label	Proposed element type
Depreciation rate, property, plant and equipment	Percentage
Useful life measured as period of time, property, plant and equipment	Duration ³
Useful life measured in production or other similar units, property, plant and equipment	Decimal ^₄
Description of useful life, property, plant and equipment	Text⁵

³ 'Duration'—when useful lives are quantified and expressed as a time period.

⁴ 'Decimal'—when useful lives are expressed as a number of production units.

⁵ 'Text'—when useful lives are expressed in a narrative statement.



Tagging useful lives and depreciation or amortisation rates—feedback

- 1) GRFC said they are *not convinced* that the proposals will be helpful.
 - a) In their experience, *most* entities use ranges to express the rates or lives.
 - b) They said that the 'decimal' element is unlikely to be useful because it would require contextual information about the *type* of units. For example, they said that if an airline depreciated the capitalised cost of maintaining an aircraft using 8,000 flying hours, simply stating '8,000' would not be helpful without specifying that the units are flying hours. As a result, in their view, either the decimal element will either require an another element to provide the additional detail or entities will use the 'text' element instead.
- 2) GFRC suggested that the variation in practice is a consequence of the non-specific requirements in IAS 16 (see paragraph 73(c)). In this regard, they think that the Board should change the disclosure requirement to either:
 - a) ask for the range in years for each class of asset; or
 - b) require disclosure of the weighted average life for a class of asset. In their view, this option would provide more meaningful information than the first option because such information could also be used to estimate the depreciation expense.



Tagging useful lives and depreciation or amortisation rates—staff response

- The staff recommends retaining the proposal to create three line items for useful lives.
- With regard to the **first point on slide 23**:
 - the IFRS Taxonomy has a range axis that can be used to tag values representing a range. This axis has members such as the 'Bottom of range', 'Top of range', and 'Weighted average'.
 - as mentioned in the PTU, the 'decimal' element type allows preparers to choose the most appropriate unit—in the example that the useful life of an aircraft is determined to be 8,000 flying hours, the decimal element will allow the preparer to indicate that the unit type is in 'flying hours'.
- With regard to the **second point on slide 23**, the comment relates to the requirements of the Standard and not the PTU. It is outside the scope of the IFRS Taxonomy to make amendments to IFRS Standards.



Improving the IFRS Taxonomy elements for tagging contingent consideration and indemnification assets in business combinations



Tagging business combinations—background and proposal

- Paragraph B64(g)(i) of IFRS 3 *Business Combinations* requires an entity to disclose for each business combination that occurs during the reporting period, the amount of contingent consideration arrangements and indemnification assets recognised as of the acquisition date.
- This disclosure requirement is currently reflected in the IFRS Taxonomy by the line item 'Contingent consideration arrangements and indemnification assets recognised as of acquisition date'.
- We proposed splitting the existing line item into two line items because contingent consideration arrangements and indemnification assets represent different accounting concepts and it is unlikely that preparers will report a combined value when they have both.

Proposed element label	Proposed documentation label
Contingent consideration recognised as of acquisition date	The amount recognised as of the acquisition date for contingent consideration arrangements assumed in a business combination. [Refer: Business combinations [member]]
Indemnification assets recognised as of acquisition date	The amount recognised as of the acquisition date for indemnification assets acquired in a business combination. [Refer: Business combinations [member]]

Tagging business combinations—feedback and staff response

- Feedback
 - Toppan Merrill suggested amending the element label of the first line item as follows:
 'Contingent consideration recognised as of acquisition date in business combination'. In their view, the phrase 'recognised as of the acquisition date' should only be used for elements representing the assets acquired and the liabilities assumed and not those elements representing liabilities transferred as part of the business combination.

Staff response

- The staff recommends retaining the proposed element label because:
 - ✓ referring to 'recognised as of the acquisition date' reflects the wording of the disclosure requirement in paragraph B64(g)(i) of IFRS 3.
 - ✓ we think the suggested wording could present the risk of a preparer inadvertently using this element to tag the aggregated contingent consideration recognised in the statement of financial position *instead of* that which was recognised *as of the acquisition date*.



Tagging business combinations—staff response

- Staff response
 - The staff recommends amending the proposed documentation label:
 - ✓ to align with the wording used in the documentation label for the existing 'Liabilities incurred' element reflecting paragraph B64(f)(iii) of IFRS 3. This element is represented in the IFRS Taxonomy under the heading 'Acquisition-date fair value of total consideration transferred [abstract]', therefore the wording 'as of acquisition date' has not been used in its element label.

Existing element label	Existing documentation label
Liabilities incurred	The fair value, at acquisition date, of liabilities incurred (for example, a liability for contingent consideration) as consideration transferred in a business combination. [Refer: Business combinations [member]]

✓ as follows: 'The amount, recognised as of the <u>at</u> acquisition date, <u>for of</u> contingent consideration arrangements acquired in a recognised as consideration transferred in a business combination [Refer: Business combinations [member]]'



Making the IFRS Taxonomy easier to navigate



New presentation group for all axes and members—background and proposal

• The IFRS Taxonomy has two types of axes:

Axes	Use	Location in IFRS Taxonomy
• General application axes	apply to a large number of IFRS Taxonomy elements.	Normally not included within any table.Located in their own presentation group.
Applied axes	apply to a relatively limited number of IFRS Taxonomy elements.	 Included in the appropriate table(s). Located in the presentation group(s) that reflect the disclosure requirements of the IFRS Standard(s) to which the table(s) relate.

- Applied axes can be applicable outside a defined IFRS Taxonomy table. However, because they are presented in various places in the IFRS Taxonomy, they may not always be easy to find.
- We proposed creating a new presentation group that includes all the available IFRS Taxonomy axes and their default members, which would make them easier to find.



New presentation group for all axes and members—feedback and staff response

Feedback

 Toppan Merrill said that it is unnecessary to create a separate presentation group because, in their view, the benefits do not seem significant. However, they added that the proposal is not inappropriate and therefore, they are not opposed to it.

• Staff response

- As mentioned in the PTU, we think that preparers may create an extension axis when they cannot find an IFRS Taxonomy axis.
- Consequently, the staff recommends retaining the proposal in order to avoid inconsistent tagging.



Removing entry points without documentation labels—background and proposal

- The IFRS Taxonomy has two sets of entry point—one set with, and one set without documentation labels. We proposed to delete the set of entry points without documentation labels.
- Currently, translated versions of the IFRS Taxonomy are based on the entry points without documentation labels. As a consequence of the proposal above, translated versions of the IFRS Taxonomy will include English documentation labels.

Name and description of entry point	Entry point without documentation labels	Entry point with documentation labels
Basic Entry Point—to view IFRS Taxonomy for full IFRS Standards reporting applying without generic links	Click here	Click here
Combined Entry Point —to view IFRS Taxonomy for full IFRS Standards, the <i>IFRS for SMEs</i> Standard and the IFRS Practice Statement <i>Management Commentary</i> reporting	Click here	Click here
Deprecated Entry Point—to view deprecated IFRS Taxonomy elements for IFRS Standards reporting	Click here	Click here
Full IFRS Standards Entry Point—to view IFRS Taxonomy for full IFRS Standards reporting	Click here	Click here
Full IFRS Standards and Management Commentary Entry Point—to view IFRS Taxonomy for full IFRS Standards reporting with Management Commentary	Click here	Click here
IFRS for SMEs Entry Point—to view IFRS Taxonomy for IFRS for SMEs Standard reporting	Click here	Click here
Management Commentary Entry Point—to view IFRS Taxonomy for Management Commentary reporting	Click here	Click here



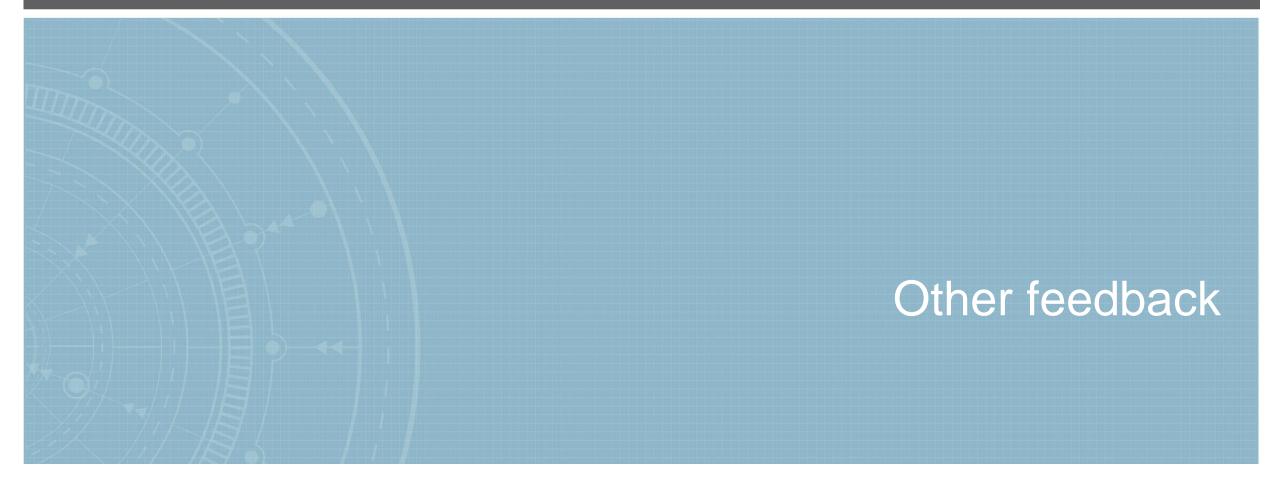
Removing entry points without documentation labels—feedback and staff response

- Feedback
 - Toppan Merrill disagreed with this proposal because it forces jurisdictions that do not want to use documentation labels to use them. They suggested that we continue providing both sets of entry points and recommend that stakeholders use the entry points with documentation labels.

Staff response

- The staff recommends retaining the proposal because:
 - regulators can customise the IFRS Taxonomy for local use, thereby allowing jurisdictions that do not want to use the English documentation labels to either remove them or replace them with alternatives.
 - we believe the IFRS Foundation should only promote good tagging practices and the use of documentation labels (and implementation notes) are key to such practices. Documentation labels help preparers understand the accounting meaning of an element by providing the relevant definition (usually obtained from IFRS Standards and their accompanying materials).







and weighted average).

GRFC suggested	Staff response
modelling depreciation methods in a way that allows preparers to select from a list (reflecting the straight line, reducing balance and units of use depreciation methods referred to in paragraph 62 of IAS 16, <i>Property, Plant and</i> <i>Equipment</i>). They said this makes the information more machine-readable.	Depreciation and inventory measurement methods are currently modelled as 'text' elements in the IFRS Taxonomy. We agree that it would be useful to provide the respective examples in a pre-defined list format in order to make the information easier to consume. We note that XBRL extensible enumerations can be used
modelling inventory measurement method in a way that allows preparers to select from a list (reflecting the different methods such as FIFO	to achieve this, however they are currently not used in the IFRS Taxonomy. We will consider whether, and if so how, to use extensible enumerations in the future.





GRFC suggested	Staff response
providing more illustrative examples to enable better understanding of how the proposals will look in the financial statements.	They made the same comments in their comment letter on proposed update for common practice relating to IFRS 13. The IFRS Foundation tags illustrative examples accompanying the IFRS Standards. We will consider whether, and if so how, to expand this to other examples in the future.
reproducing relevant requirements of IFRS Standards within the PTU to reduce time spent referring back to those Standards. They said that this will allow them more time to analyse financial statements and determine how easy it would be to tag using the proposals.	We think there is a balance to be drawn between providing enough information to understand the proposals and the length of the PTU. Nonetheless, we will consider how to strike a better balance in future PTUs, including considering hyperlinks to the electronic IFRS Standards.



Get involved



