

Meeting note—IFRS® Taxonomy Consultative Group

The IFRS Taxonomy Consultative Group (ITCG) met in the IFRS Foundation’s London office on 13 and 14 July 2022 (the majority of members attended remotely). This note, prepared by the Foundation staff, summarises the discussions. Related papers and recordings of the meeting are available on the [meeting page](#).

The ITCG members heard an overview of the request for feedback on the staff draft of an IFRS Sustainability Disclosure Taxonomy, reflecting the disclosure proposals included in Exposure Draft IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information* and Exposure Draft IFRS S2 *Climate-related Disclosures*. This overview was followed by breakout sessions on the staff draft of the IFRS Sustainability Disclosure Taxonomy. In particular, ITCG members discussed:

- structure (paragraphs 1–14);
- relationships and connections (paragraphs 15–34); and
- narrative disclosures and information related to metrics and targets (paragraphs 35–46).

The ITCG members also discussed an update on activities related to the IFRS Accounting Taxonomy (paragraphs 47–60).

Staff draft of the IFRS Sustainability Disclosure Taxonomy—Taxonomy structure

Basic architecture

- 1 Most ITCG members strongly agreed with the staff recommendation to create an IFRS Sustainability Disclosure Taxonomy separate from the IFRS Accounting Taxonomy. Members cited a few reasons for agreement with the recommendation:
 - a. IFRS Sustainability Disclosure Standards are being developed as GAAP-neutral—that is, a jurisdiction will be able to adopt IFRS Sustainability Disclosure Standards irrespective of whether it also requires the application of IFRS Accounting Standards.
 - b. taxonomies are meant to follow the standards to which they relate, and IFRS Sustainability Disclosure Standards will be independent of IFRS Accounting Standards.
 - c. IFRS Sustainability Disclosure Standards are expected to be developed separately from IFRS Accounting Standards. Maintaining a single taxonomy would add complexity when the Standards themselves are expected to be maintained and developed separately.
- 2 Some members said that that, from a preparer’s perspective, it may be easier to work with two taxonomies because it is likely that different teams within an entity would be responsible for preparing the entity’s financial statements and its sustainability-related financial disclosures.
- 3 One member said that, in some cases, sustainability-related financial information might be included in the financial statements; in such circumstances, preparers might need to double tag information in accordance with both the IFRS Accounting Taxonomy and the IFRS Sustainability Disclosure Taxonomy.
- 4 The ITCG discussed features that would help to make the IFRS Sustainability Disclosure Taxonomy usable as a ‘global baseline taxonomy’ which would allow jurisdictions to create ‘top-up’ taxonomies. Members said that the Foundation, its stakeholders and regulators in particular

need to consider technical issues. Members also said that stakeholders, such as regulators, need to create policies that could facilitate a ‘global baseline and top-up’ approach.

- 5 Members provided some suggestions to facilitate the use of the IFRS Sustainability Disclosure Taxonomy as a baseline taxonomy that supports jurisdictional top-ups/extensions (referred to as the ‘building-block approach’):
 - a. the baseline needs to be ‘correct’, and it would be helpful if a modular approach were taken in relation to the IFRS Sustainability Disclosure Taxonomy so that a jurisdiction could use only the parts that were relevant to it, rather than needing to delete the parts that were not applicable in that particular jurisdiction;
 - b. mechanisms to allow different references to be provided for elements should be implemented, so that a jurisdiction can introduce its own references (for example, to local legislation or to standards that incorporate and build on the ISSB baseline);
 - c. the architecture across various jurisdictional taxonomies/add-ons should be consistent; and
 - d. consider the viability of rules and/or principles for developing extensions which would allow the consistent development of extensions across various jurisdictions.

Taxonomy layout

- 6 Members generally agreed to create two presentation groupings, one by IFRS Sustainability Disclosure Standard and one by aspect of core content. A few members were ambivalent about the recommendation as they were unfamiliar with the appearance of sustainability disclosures.
- 7 Members also commented on presenting industry-based metrics grouped by industry. Some members worried that such a presentation method might be too structured or compartmentalised because, they said, some entities may make disclosures that were not required for their industry, and may find it difficult to find the appropriate tag. On the other hand, members also said that it would not be appropriate simply to group all industry-based metrics together; thus, in their opinion, the technical staff would need to strike a balance in determining how the industry-based metrics are structured in the IFRS Sustainability Disclosure Taxonomy.
- 8 Some members suggested using entry points to differentiate between varied groupings (by IFRS Sustainability Disclosure Standard and by aspect of core content), as well as for industry-based metrics. Some jurisdictions had either applied, or are currently applying, different entry points for preparers from different industries, for accounting reporting. However, members said that entities sometimes found it challenging to navigate through the various entry points, particularly when an entity’s business encompassed more than one industry.
- 9 Some members asked whether preparers would need to use cross-industry elements and how the layout of the IFRS Sustainability Disclosure Taxonomy might facilitate finding and using the appropriate cross-industry elements.
- 10 One member said their experience of using the SASB Taxonomy—the taxonomy on which the layout of the industry-based metrics is based—was a positive one.
- 11 One member said the Foundation should provide representation/mapping from the text of the IFRS Sustainability Disclosure Standards to the elements that are related to the disclosure requirements within that text, so that preparers can find the appropriate element that relates to a disclosure requirement in the Standard itself. In response to this suggestion, the staff explained that each element in the [draft] IFRS Sustainability Disclosure Taxonomy has a Standard and paragraph reference attached to it to assist preparers in linking an element with its related disclosure requirement (or finding the elements that relate to a disclosure requirement in an IFRS Sustainability Disclosure Standard). Furthermore, the staff said that the IFRS Foundation website includes a tool—the IFRS Standards Navigator—that shows the text of IFRS

Accounting Standards together with the related elements of the IFRS Accounting Taxonomy, and that the staff anticipated something similar would be provided for the IFRS Sustainability Disclosure Standards.

Similar disclosure requirements to IFRS Accounting Standards

- 12 Members' views differed on the staff recommendation to use similar modelling in the IFRS Accounting Taxonomy and the IFRS Sustainability Disclosure Taxonomy for similar disclosure requirements. Some members disagreed with the staff recommendation because of the potential confusion that preparers could face. These members said that using similar modelling could increase in the risk of mistagging if a preparer were to tag a single document using both taxonomies.
- 13 One member questioned whether the list in Appendix G to the staff draft of the staff request for feedback on the IFRS Sustainability Disclosure Taxonomy was complete, given its shortness. The technical staff responded in the affirmative.
- 14 Should the technical staff reconsider the rejected option to create a third taxonomy to be shared by both the IFRS Accounting Taxonomy and the IFRS Sustainability Disclosure Taxonomy? Some members said that such a third taxonomy should be created. However, members suggested that a third taxonomy should not contain all the elements relating to similar disclosure requirements; rather, it should only include non-GAAP and/or GAAP-neutral concepts, such as *Range*, *Geographical location*, *Credit grades* etc. Any similar disclosure concepts which are GAAP-related should remain in the IFRS Accounting Taxonomy only.

Staff draft of the IFRS Sustainability Disclosure Taxonomy—Relationships and connections

Reflecting the relationship between the ISSB's two exposure drafts

- 15 The purpose of this session was for ITCG members to discuss and provide feedback on the two options presented in the staff request for feedback for representing the broad relationship between disclosure requirements proposed in the first two ISSB exposure drafts.
- 16 The 'line items' option would represent the disclosure requirements proposed in each of the exposure drafts as distinct line items, limiting any expression of similarity between the exposure drafts to non-structural features such as element names or the content of labels. In contrast, the 'dimensional' option would express the apparent similarity between the proposed disclosures in the two exposure drafts by using the same set of line items in both cases, distinguishing their usage for tagging the disclosures described in each exposure draft via an axis that would include two members, one for each IFRS Sustainability Disclosure Standard. ITCG members came to no consensus on a preference for one of the two options.
- 17 Some members said that, in general, 'double tagging' is confusing for preparers. The need for preparers to 'double tag' would arise when the same disclosure would satisfy multiple requirements, in one or more Standards. Double tagging could be a common occurrence in relation to sustainability disclosures given, for example, the similarities between the proposed requirements of the two exposure drafts. Hence, standard-setters should, members said, think more about ways of setting standards with clarity and structure, and subsequently how to develop a taxonomy that represents these while minimising the need for double tagging.
- 18 Arguing in favour of the line-item approach:
 - a. Some members agreed with using the line-item approach because the many jurisdictions that have yet to embrace digital reporting would, in their view, especially value simplicity.

- b. Some members said that some small companies might only apply one of the two proposed IFRS Sustainability Disclosure Standards, for example, the proposed IFRS S2 on climate-related disclosures, or might only apply some of any future IFRS Sustainability Disclosure Standards. In such cases, a line-item approach might be more beneficial since such companies would more easily know which line items were relevant for their reporting, because each line item would 'belong' clearly to a specific standard.
- c. One member pointed out that, although 'double tagging' is feasible, 'the more towards multiple tagging one goes, the more complicated it becomes'. In particular, multiple tagging increases the risk that preparers might omit some tags, especially under the dimensional modelling approach. Indeed, the member said that the line-item approach would be preferred if multiple tagging was mandatory, or if it became established practice, more IFRS Sustainability Disclosure Standards are issued, and sections of reports are then expected to be tagged more than once because of overlapping disclosure requirements.

19 In contrast, in favour of the dimensional approach:

- a. One member said that the dimensional approach should be used because the associated issues can be solved by technology. Indeed, the dimensional approach might reduce double-tagging issues, the member said, and the IFRS Sustainability Disclosure Taxonomy could thereby be smaller and simpler.
- b. If the structure of future IFRS Sustainability Disclosure Standards is expected to be the same as that of the first two proposed Standards, and if the disclosures they require will be similar, some members said that a dimensional approach should be followed from day one. Although the line-item approach may look easier and simpler now, with the immediate prospect of only two Standards, in the future—when more IFRS Sustainability Disclosure Standards are issued—it may become necessary to switch to a dimensional model. Such a change would be confusing and costly, so, the members suggested, the more future-proof approach should be followed.

20 Some members suggested that, once more IFRS Sustainability Disclosure Standards have been developed, it will become clearer which approach better fits the relationship between the Standards and the Taxonomy. Any extensive linkage or commonality between Standards, should be reflected in the IFRS Sustainability Disclosure Taxonomy, and the dimensional approach would be preferable. In contrast, the line-item approach would be more favourable if the disclosure requirements of (future) IFRS Sustainability Disclosure Standards do not follow a consistent pattern because the line-item approach would likely prevent any inconsistency between the Taxonomy and the requirements of each Standard.

Connected information

- 21 The members discussed the proposed requirements in the Exposure Draft IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information* for entities to describe the relationships between different pieces of disclosed information. In particular, the members considered the staff recommendation that—given the current state of technology and practice—no proposals should be made for improving the digital accessibility of information that highlights connections, beyond simply capturing it in the narrative elements provided within the IFRS Sustainability Disclosure Taxonomy.
- 22 One member suggested that a reporting taxonomy should be able to be used more as a Google-type search engine than as a dictionary and providing more metadata would facilitate that kind of approach for users of the IFRS Sustainability Disclosure Taxonomy. Providing more metadata, the member said, would make the Taxonomy more efficient and effective.
- 23 Some members said that, to facilitate tagging, the IFRS Sustainability Disclosure Taxonomy itself should indicate the possible connections between different pieces of information, and

almost prepopulate this connection information. If the Taxonomy provided this kind of indication it would encourage companies to specify connections, they said; and doing so would be more effective than putting the onus on companies to identify connected information.

- 24 Some members said that worrying about this issue now might create more complexity for preparers. Moreover, due to the costs to preparers of reflecting relationships between items of tagged information when tagging, the benefits of doing so need to be made clear before making a decision.
- 25 One member suggested the use of footnotes; others were not familiar with their use and thought that such annotations might not be appropriate.

Connections between reports (cross-referencing)

- 26 The members discussed the implications for the IFRS Sustainability Disclosure Taxonomy, and for digital reporting processes and the digital reporting ecosystem more generally, of the two proposed IFRS Sustainability Disclosure Standards permitting the incorporation of *any* information by cross-reference (if that information is available ‘on the same terms’ and ‘at the same time’).
- 27 Some members pointed out that in practice what happens in this area probably depends mainly on regulators and how they mandate the tagging of cross-references (in relation to both the indication of the cross-reference and the information to which reference is made).
- 28 One member suggested using hyperlinks to make connections between reports easier to follow.
- 29 Some members said that cross-referenced information could often be key information and that its accessibility is important. They agreed with the staff recommendation.
- 30 Some members said that it is the information that is incorporated by cross-reference (ie the data that is found in the location to which reference is made) that is important. In contrast, tags to capture the indication of the cross-reference in the referring section/document (for example ‘see page 4 of our climate report’) will not be significant for users. However, the members also said that tagging this indication would still be better than not having anything tagged.
- 31 Some members did not think that hidden tags should be used to include information within the primary document that on paper is incorporated by cross-reference to a secondary document because preparers, users and auditors may be unfamiliar with a digital representation that differs from its paper counterpart, and such an approach might, some members warned, create mismatches since the PDF version might not match the tagged data of the digital version. In contrast, some members said it was a good idea to have the digital version of all sustainability information together in one place, using hidden tags to include the information from the secondary document into the primary, and that this *would* be a faithful representation of the information in the paper documents, taking those documents as a whole.
- 32 Some members supported the proposals in the two ISSB exposure drafts to allow cross-references to other information. They suggested that such a practice would help to prevent the duplication of scattered sustainability information. In a digital world, compiling and rearranging information from scattered reports in one place and making it available digitally is a necessary capability anyway, so the usefulness for the users of having the cross-referenced documents tagged would likely outweigh the inconvenience of having the information spread between multiple documents, they said.
- 33 One member said that preparers sometimes cross-refer to a broad section of a document and a user has to spend time locating the required specific information within that section. If that specific required information were to be tagged in the cross-referenced document, it would be easier for users to find it.

- 34 Members said that checking cross-references will make assurance more difficult and complex because there could be different processes and time lines in engaging with the parties responsible for different parts of the document, or different documents. Checking cross-references would complicate assurance even if entities only used paper documents, and the assurance of multiple interconnected tagged documents would be equally or more challenging.

Staff draft of the IFRS Sustainability Disclosure Taxonomy—Narrative disclosures

Granularity of information

- 35 The purpose of this session was for ITCG members to discuss and provide feedback on how detailed the elements created for tagging narrative information should be. Members were also asked to share their experience of tagging information using elements that are related to each other in a hierarchical structure, and the impact of such structures and tagging on stakeholders in the digital ecosystem. Members were also asked about any concerns related to tagging highly styled HTML documents.
- 36 Members shared observations on the appropriate level of detail for narrative information:
- a. One member pointed out that although Artificial Intelligence (AI) is an advanced technology, it needs subsets of data relating to a topic (such as is provided by XBRL text blocks or detailed elements) to work well. AI needs a subset of data because when data items contain too much text, much of which is irrelevant, AI struggles to produce the desired output.
 - b. One member commented that individual regulators may decide the level of detail at which preparers are required to tag, which could lead to inconsistent tagging.
 - c. In the experience of another member, if a regulatory framework requires tagging information at an excessive level of detail, the process could become too complex for preparers, and, as a result they may avoid including information in their reports to avoid needing to tag it.
 - d. Some members observed that, for paper-based reports, making judgements about the materiality of information is important; and that the need to make that kind of decision in relation to the amount of detail of the information tagged might also arise. Consequently, stakeholders may need to discuss how to apply materiality judgements in digital reporting.
- 37 There were mixed views about the hierarchical structure of elements related to narrative information:
- a. A member using a similar hierarchical structure to tag narrative reporting said that doing so was easy.
 - b. Another member pointed out that the more detailed elements that are included in the IFRS Sustainability Disclosure Taxonomy and required to be used for tagging, the more costly it will be for preparers. From a preparer's perspective, extensive hierarchical modelling is costly. Even though there are benefits to the hierarchical approach, it is simpler to use only broad text blocks.
 - c. Double-tagging issues, similar to those raised in the breakout sessions on 'Relationships and connections', were discussed. One member thought that a hierarchical structure could provide information about the relationship between reported elements, or the expected precedence in the use of specific tags, that might help avoid a need for double tagging.
- 38 Members had some general observations related to tagging narrative information:

- a. Some members said that templates would be useful for narrative information, forcing reporting to fit the structures implied by the two proposed IFRS Sustainability Disclosure Standards, and therefore to fit the resulting IFRS Sustainability Disclosure Taxonomy. Consequently, the resulting data would be more comparable and useful to users of the information.
 - b. Members said that there were currently concerns about, and evolving practice related to, the tagging of narrative information under the EU's ESEF reporting; and that, as that reporting progresses and resulting information becomes available, the staff might be able to gain insights from analysing these reports.
- 39 One member said that some aspects of information tagged using text blocks could become lost in its conversion from an HTML file to an XBRL file, as much of the styling information may not carry across or may not be usable out of the context of the original HTML document. In such circumstances, the information tagged using text blocks is very hard, if not impossible, to read. This is a particular problem with HTML documents created from a PDF file using automatic conversion tools but it can also occur in other heavily styled HTML documents, and often affects tables. The member who raised the issue said that software vendors will need to resolve this technological problem in the coming years.

Categorical elements

- 40 The purpose of this session was for ITCG members to discuss and provide feedback on the staff recommendation to use categorical elements¹ for specific narrative disclosures. In addition, members were asked to share:
- a. any concerns related to the use of categorical elements for narrative disclosures in the IFRS Accounting Taxonomy, on the assumption that the staff recommendation for using categorical elements will be accepted by the ISSB and that such elements will be used in the IFRS Sustainability Disclosure Taxonomy; and
 - b. any thoughts on the alternatives the staff considered in the slides for introducing categorical elements in the IFRS Accounting Taxonomy.
- 41 In relation to using categorical elements in the IFRS Sustainability Disclosure Taxonomy, members generally agreed with the staff analysis that such an element type is helpful to analyse some narrative information. However, some members said that Boolean-type elements should only be used when there is a clear requirement in an IFRS Standard to disclose a 'yes or no' answer. One member pointed out that preparers may provide information in a format that does not easily fit that type of answer, but rather 'yes, for some information and no for other information' or 'yes, but some exceptions may apply'.
- 42 In relation to introducing categorical elements to the IFRS Accounting Taxonomy:
- a. One member supported the approach described as Option 2 of simply changing the element type of the relevant elements, considering this to be easier and simpler than the other options. Some other members agreed because they did not expect this change would affect many elements.
 - b. However, many members disagreed with Option 2; they said it would be confusing to change the element type and supported using either Option 1 (replacing text elements with new categorical elements) or Option 3 (keeping existing text elements and including additional categorical elements). There were mixed views as to whether Option 1 or 3 is preferable.

¹ Items that are reported as a choice from a specific list of options, such as 'yes/no' or 'high/medium/low', rather than as numbers or as free text.

- c. Another member suggested that the view of regulators would need to be checked when deciding to change data types or introduce new categorical elements.

Modelling metrics and targets

- 43 The purpose of this session was for ITCG members to discuss and provide feedback on the staff recommendation to:
 - a. create elements, equivalent² to those in the SASB Taxonomy, for defined metrics common to the IFRS Sustainability Disclosure Standards and SASB Standards in the IFRS Sustainability Disclosures Taxonomy; and
 - b. model disclosures related to entity-specific metrics and targets using line items to represent the specific items of information required to be disclosed about each metric or target, combined with an axis to identify which metric or target is being discussed.
- 44 Members were also asked to share their views on how best to connect disclosures about entity-specific metrics and targets to their entity-specific values.
- 45 In relation to the modelling of defined metrics, members generally agreed with the staff recommendation. They concluded that the alternative considered—using SASB’s namespace—would be misleading because the ISSB has assumed ‘ownership’ (in the sense of being responsible for the definition) of the industry-specific metrics.
- 46 Members generally agreed with the staff recommendation to model the disclosures about entity-specific metrics and targets using the proposed approach. They also suggested that the entity-specific metrics’ values could be connected to the remaining disclosures about the entity-specific metrics and targets using the same logical table (ie using the same axis).

IFRS Accounting Taxonomy—Update on Activities

- 47 The staff provided the ITCG members with:
 - a. an update on the Taxonomy team’s work programme for the coming years;
 - b. an introduction to the Subsidiaries without Public Accountability project and related taxonomy considerations; and
 - c. initial thinking in relation to stakeholder feedback on the taxonomy modelling for IFRS 16 *Leases*.

Work programme

- 48 The staff summarised the IFRS Taxonomy team’s three categories of work, and the pipeline of projects and work items for the next few years, to the ITCG members.
- 49 Three main long-term work areas were identified.
 - a. Support for the Primary Financial Statements (PFS) project is expected to continue over the next few years. This includes further development of the implementation of reporting on management performance measures as well as work on any other fundamental modelling questions arising from the PFS project.
 - b. Staff pointed out that a common practice review on the IFRS Accounting Taxonomy’s representation of disclosures for financial instruments will be carried out.

² For example, the SASB Taxonomy includes the element `sasb:CoalReservesProbable` to disclose the (total) mass of probable coal reserves. That same disclosure is included in Appendix B to Exposure Draft IFRS S2 *Climate-related Disclosures*, and so the staff draft IFRS Sustainability Disclosure Taxonomy includes an element `ifrs-sds:CoalReservesProbable`.

- c. Alongside work on the IFRS Accounting Taxonomy, preparation for and development of the IFRS Sustainability Disclosure Taxonomy will continue, as will consideration of any consequential implications for the Accounting Taxonomy.

50 The standard-setting projects currently expected that will result in significant taxonomy work are the Second Comprehensive Review of the IFRS for SMEs Accounting Standard, Disclosure Initiative—Subsidiaries without Public Accountability: Disclosures, and Rate-regulated Activities.

Stakeholder feedback—Elements pertaining to IFRS 16 Leases

- 51 On the feedback regarding IFRS 16 Leases, one member was aware that preparers tagging property, plant and equipment (PPE) that either includes or excludes right-of-use assets struggle to determine what elements to use: should it be 'included', 'excluded', or should an extension be created?
- 52 One member pointed out that in the US GAAP taxonomy, a separate element was created for 'PPE including right-of-use assets' as a common-practice element. Another member supported that approach but said that, since IFRS Accounting Standards require the disclosure of a 'roll-forwards' of such assets, various additional elements to support those disclosures may be needed, for example, for reconciliations.
- 53 One member commented that this might be a question for the IASB as to whether they wanted preparers to be clear as to what they had disclosed, ie to be clear whether a figure disclosed includes or excludes right-of-use assets.
- 54 The staff stated that there is a requirement to elaborate in the notes if and where right-of-use assets are included in other lines in the primary statements. The draft IFRS Sustainability Disclosure Taxonomy includes elements to represent this disclosure in the notes (though the disclosure would not currently be tagged in all jurisdictions). Sufficient information to deduce whether the figures presented in the primary statements include or exclude right-of-use assets should therefore be available in the financial statements as a whole.
- 55 The staff observed, however, that expecting users of information to interpret information carefully considering the context of the rest of the financial statements could be problematic. Furthermore, that expectation might be reasonable for a reader of a single set of financial statements in paper form, but it may not be as reasonable in relation to a user of information from potentially many different financial statements in digital form. So, simply relying on this information being available in the notes may not be sufficient to support digital financial reporting.
- 56 The members also agreed with the proposal to deprecate one redundant element, 'Right-of-use assets that do not meet the definition of investment property', and to add an annotation to the documentation label and reference of the element 'Right-of-use assets' that it also does not meet the definition of investment property.

Subsidiaries without Public Accountability—Disclosures

- 57 The purpose of this session was for ITCG members to provide feedback on the staff's indicative plan to include new elements, resulting from the proposed IFRS Accounting Standard *Subsidiaries without Public Accountability: Disclosures*, in the 'full IFRS' entry point and present them in a separate presentation group (ELR).
- 58 One member pointed out that the elements for subsidiaries without public accountability are likely to be sparsely used because such companies are unlikely to be required to tag their reports.
- 59 For listed companies outside of the scope of the proposed Standard, it will be important to be clear that they must not use the elements that are designed for subsidiaries without public

accountability. There will be a risk that some preparers might pick the wrong elements for tagging. Several members said that simply placing the elements for subsidiaries without public accountability in a separate ELR would be insufficient to avoid that risk. Consequently:

- a. One member suggested including guidance labels for new elements that are only appropriate for subsidiaries without public accountability.
- b. Another member suggested some automatic checks could be developed to check if incorrect elements were used by companies outside of the scope of the proposed Standard.
- c. One member thought that including the new elements for subsidiaries without public accountability in a separate entry point would be more appropriate. This approach would allow subsidiaries without public accountability to use the new entry point as well as the one for companies applying full IFRS Accounting Standards, if needed. This approach would also prevent any unnecessary risk of choosing the wrong element by listed companies outside the scope of the proposed Standard.

- 60 One member considered future amendments to IFRS Standards that might apply to (companies that apply) full IFRS Accounting Standards as well as applying to subsidiaries without public accountability. In such cases, the IFRS Accounting Taxonomy would require updating in both areas. If this were a frequent requirement, having a separate taxonomy (or, to a lesser extent, a separate entry point or ELR) for subsidiaries may not be efficient as it would be likely to double the required effort to make such updates.