
IASB[®] Meeting

Date **October 2026**

Project **Intangible Assets**

Topic **User information needs—Consultative group feedback and staff reflections on key themes**

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This paper has been prepared for discussion at a public meeting of the International Accounting Standards Board (IASB). This paper does not represent the views of the IASB or any individual IASB member. Any comments in the paper do not purport to set out what would be an acceptable or unacceptable application of IFRS[®] Accounting Standards. The IASB's technical decisions are made in public and are reported in the IASB[®] *Update*.

Background and purpose of the paper

1. At its [May 2025 meeting](#), the International Accounting Standards Board (IASB) decided on the topics it would explore in the Intangible Assets project and selected, as one of the initial work streams, assessing user needs for information about recognised and unrecognised intangible assets and expenditure associated with them. [Appendix B](#) of this paper provides a visual overview of the project direction decided in May 2025. The IASB also noted that it would consider, at regular reflection points, whether new evidence indicates a need to change the project's direction.
2. At its [May 2026 meeting](#), the IASB discussed:
 - (a) the findings from the user information needs work stream (see May 2026 IASB Agenda Papers [17A](#), [17B](#) and [17C](#)); and
 - (b) the staff initial thoughts on how those findings could affect the direction of the project (see May 2026 IASB Agenda Paper [17D](#)).

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3. At the June 2026 joint Capital Markets Advisory Committee (CMAC)–Global Preparers Forum (GPF) meeting and July 2026 Accounting Standards Advisory Forum (ASAF) meeting, the IASB sought advice on whether (and how) the findings from the user information needs work stream should affect the direction of the project. In particular, the consultative groups discussed whether those findings should affect the priority of, and options for exploring, the topics the IASB previously decided to explore.
 4. In developing our initial staff leanings for the May 2026 IASB discussion, we considered some options for the scope and relative priority of topics and assessed their advantages and disadvantages. For the subsequent discussions with CMAC, GPF and ASAF, we presented additional options for some topics to obtain fuller feedback (but retained our initial leanings). [Appendix A](#) of this paper contains extracts from the materials presented to the consultative groups, including a visual overview of our staff leanings on project direction.
 5. The purpose of this paper is:
 - (a) to summarise the feedback received from CMAC, GPF and ASAF on our May 2026 staff leanings and alternative options considered; and
 - (b) to set out our staff reflections on key themes arising from that feedback.
 6. This paper does not ask the IASB to make any decisions. However, we welcome IASB members' comments and questions.
 7. For a future meeting, we intend to bring a paper that provides staff analysis and recommendations and asks the IASB to decide whether, and if so how, the project direction decided in May 2025 should change in the light of the findings from the user information needs work stream, together with the feedback from CMAC, GPF and ASAF and other relevant evidence gathered throughout the project, including evidence from academic literature, national standard-setters and other sources (see Agenda Paper 17C *Academic and other evidence review—update* for this meeting).

Structure of the paper

8. This paper is structured as follows:
 - (a) [May 2026 position and options considered](#)—an overview of our initial staff leanings presented in May 2026 IASB Agenda Paper [17D](#) and the alternative options for each topic subsequently presented to CMAC, GPF and ASAF;
 - (b) [IASB consultative group feedback](#)—a summary of feedback from CMAC, GPF and ASAF;
 - (c) [staff reflections on key themes arising from the feedback](#); and
 - (d) [question for IASB members](#).
9. [Appendix A—Initial staff thoughts on implications for project direction](#) contains extracts from the materials we presented to IASB consultative groups. Figure A1 of Appendix A provides a visual overview of the staff May 2026 leanings on project direction.
10. [Appendix B—IASB May 2025 decisions on project direction](#) provides a visual overview of the IASB decisions in May 2025.

May 2026 position and options considered

11. This section of the paper summarises, for each topic, the options considered (including the additional options subsequently presented to CMAC, GPF and ASAF) and our May 2026 initial leanings. [Appendix A](#) to this paper provides further detail from the consultative group materials, and May 2026 IASB Agenda Paper [17D](#) explains the supporting analysis for the initial leanings.

Broader review of the recognition requirements in IAS 38 Intangible Assets

12. We considered four options for the extent and timing of broader recognition work:
- (a) **Option 1—Remove the work stream**—undertake no broader recognition work beyond potential improvements arising from the current definition and recognition test-case based work;
 - (b) **Option 2—Fatal-flaw review focusing on consistency (initial staff leaning)**—identify inconsistent or unintended outcomes from applying the existing recognition requirements in IAS 38 and consider targeted amendments to address identified deficiencies, without developing a new recognition model;
 - (c) **Option 3—Integrated recognition and disclosure assessment**—assess in parallel whether users’ information needs would be better met through targeted recognition amendments or improved presentation and disclosure requirements; and
 - (d) **Option 4—Blank-sheet reconsideration (full conceptual review)**—reassess the recognition requirements from first principles and develop an alternative recognition model without starting from the existing requirements in IAS 38.
13. Our May 2026 initial leaning, retained for the consultative group discussions, was **Option 2**. Although the evidence did not indicate broad demand for a new recognition model or expanded recognition of internally generated intangible assets, users expressed recurring concerns about the inconsistent application of the existing recognition requirements. A targeted recognition review could assess whether identified inconsistent or unintended IAS 38 recognition outcomes indicate deficiencies in IAS 38 recognition requirements that could be addressed through targeted amendments, while providing a foundation for subsequent disclosure work. We envisaged undertaking the review next in the project, building on and being informed by the current definition and recognition test-case-based work.

Improving disclosure requirements

14. We considered four options for the scope and timing of disclosure work:
- (a) **Option 1—Start next: comprehensive disclosure work stream**—begin, as the next major work stream, exploring a package of improvements focused on users’ four main information challenges: linking spending on intangible activities to outcomes; connecting information in narrative reports with amounts in the financial statements; improving comparability; and understanding recognised intangible assets, including those acquired in a business combination (see May 2026 IASB Agenda Paper [17B](#), which provides the underlying evidence on user information needs);
 - (b) **Option 2—Same scope as Option 1, but start later (initial staff leaning)**—undertake the same comprehensive disclosure work stream once the current definition and recognition test-case based work and the targeted recognition review have progressed sufficiently to inform it;
 - (c) **Option 3—Integrated recognition and disclosure assessment**—assess recognition and disclosure together as described in Option 3 in paragraph 12(c) of this paper; and
 - (d) **Option 4—Prioritise discrete disclosure improvements now and consider other improvements later**—undertake selected targeted improvements, such as connecting information in narrative reports with amounts in the financial statements, before developing the broader package after other work streams have progressed sufficiently.
15. Our May 2026 initial leaning, retained for the consultative group discussions, was **Option 2**. This leaning reflected the strong user demand for improved information. Option 2 would allow the definition and recognition work to inform disclosure requirements, rather than use disclosure to compensate for possible deficiencies in the recognition requirements. A later start of the disclosure work could also enable the IASB to consider evidence emerging from entities’ implementation of new reporting requirements, including IFRS 18 *Presentation and Disclosure in Financial Statements*, IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information* and IFRS Practice Statement 1 *Management Commentary Practice Statement*.

Accounting for intangible assets held for investment

16. We considered three options for the work on intangible assets held for investment:
- (a) **Option 1—Broad ‘by use / purpose’ exploration (initial staff leaning)**—explore a principle-based approach reflecting the use or purpose of holding an asset, potentially using some carbon credits, cryptocurrencies and other suitable assets as test cases;
 - (b) **Option 2(a)—Split / defer**—consider cryptocurrencies and carbon credits through separate projects outside the Intangible Assets project and retain the broader held-for-investment topic for later exploration in the Intangible Assets project if suitable examples and related issues are identified; and
 - (c) **Option 2(b)—Split / stop**—consider cryptocurrencies and carbon credits through separate projects and undertake no further held-for-investment work in the Intangible Assets project.
17. Our May 2026 initial leaning, retained for the consultative group discussions, was **Option 1**, with work beginning later in the project. Although direct evidence from the user needs work stream was limited, the topic had received strong support in the initial outreach, and a principle-based approach could help future-proof IAS 38 by reflecting how intangible assets contribute to cash flows and performance. A later suggested start reflected the higher relative priority of the recognition and disclosure work streams, while also allowing the IASB to consider the definition work and any wider IASB decisions on potential projects on cryptoassets or pollutant pricing mechanisms.

Improving the comparability of information

18. We considered two related aspects of the comparability topic:
- (a) **comparing organically growing and acquisitive entities**—whether, and how, to improve the comparability of information about internally generated intangible assets and those acquired in business combinations; and

- (b) **the usefulness of information about intangible assets recognised in a business combination**—whether to improve disclosures and reconsider the extent of intangible assets recognised in a business combination within the scope of this project.
19. Our May 2026 initial leaning, retained for the consultative group discussions and consistent with the May 2025 project direction, was to explore both aspects later in the project. Many users raised comparability concerns, although the strength of those concerns varied depending on their analytical approach, and their requests generally focused on improved presentation and disclosure rather than changes to the accounting model for acquired intangible assets.
20. Later consideration of the topic would allow the IASB to assess the effects of the recognition and disclosure work and other relevant developments before deciding whether additional work to improve comparability is needed within the scope of this project and, if so, when it would be most appropriate to undertake that work. Any broader reconsideration of the accounting for business combinations would extend beyond the scope of the Intangible Assets project and would need to be considered through the IASB’s wider work plan processes.

Reporting a broader range of intangible items in the financial statements

21. Our May 2026 initial leaning, retained for the consultative group discussions and consistent with the May 2025 project direction, was not to establish a separate work stream on reporting a broader range of intangible items in the financial statements at this stage. Although users consider broader intangible factors, such as management reputation and employees’ expertise, in their analyses, the evidence did not indicate significant demand to report those items in the financial statements. This position would allow the IASB to consider developments in related IFRS Foundation activities and reporting practice, and the connections between information in financial statements and information in other reports.

Other topics

22. The additional evidence from the user needs work stream did not indicate a need to change the May 2025 decisions:
- (a) to explore potential improvements to some aspects of the definition of an intangible asset, related guidance and recognition requirements, using test cases (ongoing work stream);
 - (b) to address measurement matters as they arise in other work streams rather than establish a separate measurement work stream;
 - (c) not to explore, as a separate work stream, consistency of labels for different intangible items in the project, but to consider terminology matters where relevant in other work streams; and
 - (d) not to explore accounting for intangible assets covered by other IFRS Accounting Standards.

IASB consultative group feedback

23. This section summarises:
- (a) comments from CMAC members on the IASB's findings from the user information needs work stream;
 - (b) consultative group (CMAC, GPF and ASAF) feedback on the topics that attracted the most comments, particularly:
 - (i) the relative priority, scope and sequencing of the recognition and disclosure topics; and
 - (ii) the priority and timing of the held-for-investment topic and how the IASB might address it, including through separate projects or a principle-based approach within the Intangible Assets project; and
 - (c) consultative group feedback on other topics.

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24. The [June 2026 joint CMAC–GPF meeting summary](#) and [July 2026 ASAF meeting summary](#) provide further details.

Comments on the IASB’s findings from the user information needs work stream

25. CMAC members who spoke about the IASB’s findings from the user information needs work stream broadly supported those findings and said they reflected their experiences. These members said users generally view intangible activities as drivers of an entity’s overall performance and future cash flows, rather than as standalone assets, and seek clearer, better-connected and more disaggregated information instead of broader recognition. However, some CMAC members qualified the findings. For example, one member said users’ views on comparability between acquired and internally generated intangible assets were more polarised than the IASB’s findings suggested, with stronger demand for changes to the underlying accounting.

Topics that attracted the most comments

Broader review of recognition versus disclosure: relative priority, scope and sequencing

26. Views on the relative priority and sequencing of the recognition and disclosure topics reflected three broad approaches:
- (a) **prioritise disclosure improvements**—some CMAC and a few GPF members favoured progressing disclosure improvements as soon as possible. Some ASAF members also suggested prioritising disclosure; a few of them said broader recognition work could take considerable time and resources and delay providing more useful information to users. Some CMAC and GPF members supported prioritising targeted disclosure improvements that could provide a quicker response to users’ concerns.

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- (b) **progress recognition matters first**—some GPF and a few CMAC members preferred disclosure improvements to be linked to progress on recognition. These members emphasised the importance of understanding the distinction between recognised and unrecognised intangible assets and considered progress on recognition to be an important foundation for disclosure improvements. Some ASAF members also suggested progressing recognition matters first.
- (c) **progress aspects of both work streams together**—a few CMAC and GPF members suggested that elements of the work could progress in parallel. An ASAF member suggested considering recognition and disclosure together, while prioritising some urgent disclosure improvements now and considering other improvements later, after other work streams had progressed sufficiently. Another ASAF member supported timely disclosure improvements without ignoring recognition matters that could be addressed without significantly delaying the project.
27. Consultative groups' views also differed on the scope of recognition work. Most CMAC and GPF members supported reviewing the recognition requirements in IAS 38. Many CMAC and GPF members, as well as an ASAF member, supported a targeted 'fatal-flaw' review focused on improving consistency in applying the existing requirements. However:
- (a) a few CMAC and GPF members questioned whether such a review would be sufficient in the light of economic and technological developments, including the increasing importance of artificial intelligence.
- (b) an ASAF member suggested a broader recognition project because stakeholders' concerns went beyond a fatal-flaw review. In contrast, another ASAF member cautioned against broader work unless a viable solution could be developed without taking many years.
- (c) some CMAC and GPF members said the existing requirements might remain sufficient if applied consistently and cautioned against expanding recognition.

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28. Feedback also identified the following considerations relevant to the scope and timing of disclosure work:
- (a) **constraints**—some CMAC and GPF members cautioned that improving disclosure requirements would need to be targeted, noting challenges relating to the boundaries of financial statements and to commercial sensitivity. Many ASAF members asked whether all disclosures requested by users belong in the financial statements. Some ASAF members also raised concerns about cost, proportionality and availability of systems and processes needed to provide the information. An ASAF member suggested that disclosure requirements should be scalable and auditable.
 - (b) **a potential dependency**—an ASAF member (Financial Accounting Standards Board (FASB) representative) said the FASB was waiting to assess information resulting from its project on disaggregation of income statement expenses before considering whether further disclosure improvements were needed (see paragraph 15 of this paper for relevance of evidence emerging from IFRS 18).

Intangible assets held for investment: priority and how the topic might be addressed

29. Most CMAC and GPF members emphasised that work on cryptocurrencies and carbon credits—the most common examples of intangible assets held for investment—should not slow progress on higher-priority recognition or disclosure work. Although most ASAF members suggested exploring improvements to accounting for intangible assets held for investment, views differed on the topic's priority. Some ASAF members supported progressing the topic without undue delay, whereas another ASAF member said it could follow broader recognition and disclosure work.

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30. Members suggested two broad approaches to how and where the IASB might address the topic:
- (a) **separate projects**—most CMAC and GPF members and some ASAF members supported addressing cryptocurrencies and pollutant pricing mechanisms through separate projects. A few CMAC and GPF members suggested that such work should consider the topic comprehensively, including related liabilities. A few other CMAC and GPF members and a few ASAF members suggested drawing on the FASB's work on this topic as a source of practical solutions. A few ASAF members considered measurement, rather than recognition, to be the principal issue. However, an ASAF member cautioned that separation could create issues if those assets were later brought back into the Intangible Assets project.
 - (b) **a principle-based approach within the Intangible Assets project**—a few CMAC and GPF members and some ASAF members supported a principle-based approach to exploring the topic. A few members suggested focusing on the purpose of holding an asset or an entity's business model, including distinguishing between operational and investment uses.

Other topics and comments

31. There was general support for considering the comparability topic later in the project. Most CMAC and GPF members agreed that progress on improving disclosure requirements and other work streams would provide a better foundation for considering the topic. A few ASAF members also supported waiting until recognition and disclosure work had progressed. However:
- (a) some CMAC and GPF members said full comparability might not be achievable or appropriate because the differences in accounting for acquired and internally generated intangible assets can reflect different economics, measurement approaches or business models; and

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- (b) an ASAF member questioned how the comparability issue could be addressed without changing the recognition criteria.
32. Members also commented on:
- (a) **intangible assets acquired in a business combination**—some CMAC and GPF members suggested that improved disclosures could help users understand these assets, including information about purchase price allocation and where acquired intangible assets are reported (for example, within segments or cash-generating units). An ASAF member said some users' concerns relate more directly to IFRS 3 *Business Combinations* than IAS 38. Another ASAF member said users often remove some customer-related intangible assets from their analyses because they do not view them as meaningful assets separable from the business.
 - (b) **newer types of intangible assets**—some ASAF members highlighted the importance of improving the accounting for these assets.
 - (c) **implementation considerations**—a few ASAF members emphasised the importance of considering preparers' views, including on the costs and practical challenges of implementing any proposals.

Staff reflections on key themes arising from the feedback

33. We have identified three main themes coming out of the consultative group feedback that we think would be relevant for the future decision-making paper (see paragraph 7 of this paper). These themes relate to:
- (a) the relationship between the recognition and disclosure work streams;
 - (b) a clearer articulation of the broader recognition work, including its scope and timing; and
 - (c) considerations related to the accounting for intangible assets held for investment topic, including its priority, timing and inclusion within the Intangible Assets project.

Recognition and disclosure

34. One theme emerging from the feedback was the relationship between the recognition and disclosure work streams. Although views differed on sequencing and interaction, the feedback indicated strong interest in disclosure improvements and, for many consultative group members, disclosure appeared to be the clearest priority. However, some members viewed further recognition work as an important input to subsequent disclosure discussions, while others suggested that aspects of both work streams could progress in parallel.
35. This theme suggests that future analysis will need to consider how the relative priority, sequencing and interaction of the recognition and disclosure work streams should be reflected in the project direction. In particular, it may be important to consider:
- (a) how any proposed sequencing reflects both the importance attached to disclosure improvements in the feedback received and the differing stages of preparedness of the recognition and disclosure work streams, given that, as noted in paragraph 14(a) of this paper, the user information needs work stream has already provided a substantial evidence base for the disclosure work stream; and
 - (b) how progress in one work stream could inform the other and the extent to which the two work streams could overlap.

Broader recognition work

36. Another theme emerging from the feedback was the appropriate scope of any broader recognition work. Although many consultative group members supported further consideration of recognition-related matters, views differed regarding how extensive that work should be. Many members supported a targeted review focused on identified challenges in applying the existing recognition requirements, while some questioned whether broader recognition work was needed and others suggested a wider review might eventually be required. The feedback also reflected concerns that

broader recognition work could become lengthy, consume significant resources and delay progress in other areas of the project.

37. This theme suggests that future analysis will need to consider how the purpose, scope, limitations and expected timing of any broader recognition work should be articulated. In particular, it may be important to explain:
- (a) what any broader recognition work would be intended to achieve;
 - (b) how extensive such work could be;
 - (c) how it might be structured, including how matters identified through the current test-case work could inform any broader recognition work;
 - (d) how it would fit within the overall project timetable; and
 - (e) how concerns about project duration and delay could be addressed.

Accounting for intangible assets held for investment

38. A further theme emerging from the feedback was the priority, timing and inclusion of the topic of accounting for intangible assets held for investment within the project. Although consultative group members generally indicated continued interest in exploring improvements in this area, views differed regarding how and when the topic should be addressed. Many members favoured addressing cryptocurrencies and pollutant pricing mechanisms through separate projects, whereas others supported continuing to explore the topic within the Intangible Assets project. The feedback also reflected differing views regarding the relative priority of this topic compared with other project work streams.
39. This theme suggests that future analysis will need to consider whether and how this work stream could be included in the Intangible Assets project and the implications of the different approaches identified in the feedback. In particular, it may be important to consider:

- (a) how the relative priority of this work stream compares with the recognition and, in particular, the disclosure work streams, in light of the importance attached to those work streams in the feedback received;
- (b) how any potential separate projects could interact with the Intangible Assets project;¹
- (c) how those interactions could affect any principle-based exploration of the topic within the Intangible Assets project; and
- (d) how those considerations could affect both:
 - (i) the role of this topic within the overall project direction; and
 - (ii) the approach to exploring the topic within the Intangible Assets project.

Question for IASB members

Question for IASB members

Do you have any questions or comments on the feedback summarised in this paper and the staff reflections on key themes arising from that feedback?

¹ For information about potential projects on cryptoassets and pollutant pricing mechanisms that could be added to the IASB's work plan if capacity becomes available before the next Agenda Consultation, see the [IASB's pipeline projects webpage](#).

Appendix A—Initial staff thoughts on implications for project direction

A1. Tables A1–A6 of this appendix contain extracts from the materials we presented to IASB consultative groups ([June 2026 joint CMAC and GPF Agenda Paper 2](#) and [July 2026 ASAF Agenda Paper 2](#)) and summarise, for each topic, the findings from the user information needs work stream, the staff commentary—including on timing—and the initial staff leaning. Where applicable, the tables also set out the options or concerns considered.

Table A1—Broader review of the recognition requirements in IAS 38

User feedback	- Limited appetite for expanded recognition of internally generated intangible assets; most users prefer enhanced disclosures and transparency rather than recognising more assets. - Users’ recurring concern is lack of consistency in applying the recognition criteria (for example, varying capitalisation rates within a sector), rather than a call for a new recognition model.
Options for exploring	Staff commentary, including on timing
1—Remove the work stream Given limited user appetite for expanded recognition, no further work on this topic in the project (beyond the work on potential improvements based on the agile development test case).	- Frees capacity to deliver disclosure improvements users prioritise. - If removed, users’ concerns on consistency would likely be targeted through disclosure. Improved disclosure: - could help users make better adjustments, but would not resolve the underlying issues and reduce the need for user adjustments; and - might not solve all recognition-related issues. - Might not be considered a comprehensive review.

2—Fatal-flaw review focusing on consistency - Pinpoint inconsistent or unintended IAS 38 recognition outcomes based on all the feedback collected in the project (for example, varying capitalisation rates within a sector that impairs comparability). - Clarify related recognition requirements—possibly supported by targeted disclosures—rather than expanded recognition.	- Aims to clarify existing IAS 38 recognition requirements focusing on the areas feedback indicates as not working as intended—not to develop a new recognition model. - More manageable and timely. - Could be started next in the project to allow improvements to be made on a timely basis by combining targeted amendments to the definition and any changes to the recognition requirements together in one package—providing a solid basis for any disclosure requirements to be developed.
3—Integrated recognition and disclosure assessment Assess in parallel whether user needs are better met via targeted recognition amendments or improved presentation and disclosure requirements.	- Helps ensure disclosure is not used as a substitute where a genuine recognition deficiency exists. - Allows disclosure improvements to proceed promptly. - Without tight control, it could become too broad, delay making improvements and focus on topics that may not have broad support.
4—Blank-sheet reconsideration (full conceptual review) Reassess from first principles and design an alternative recognition model as if the current requirements did not exist.	- Likely to be more extensive and complex and take longer because of the broad spectrum of intangible assets. - Unlikely to have buy-in from stakeholders because of limited support for a fundamental change to recognition.
Staff leaning	Option 2: the focused scope would allow addressing specific identified issues and improving consistency of application in a timely manner.

Table A2—Improving disclosure requirements

User feedback	• Strong demand for disclosure-led improvements to help: link spend-to-outcomes, link narrative-to-numbers, compare entities and understand recognised intangible assets—but must weigh commercial sensitivity and cost/benefit. • Information availability varies widely across/within sectors; scope to improve financial statement information across sectors without seeking ‘pharma-level’ of information (see Appendix A of May 2026 Agenda Paper 17B for an illustration of how these information differences affect valuation approaches in healthcare (pharmaceutical) and technology) or requiring information that does not belong in financial statements.
Options for exploring	Staff commentary, including on timing
1—Start next: comprehensive disclosure work stream Prioritise improving disclosure requirements as the next major topic, building a package of improvements focused on the four user challenges: • spend-to-outcomes; • narrative-to-numbers; • comparability; and • recognised intangible assets.	• Directly responds to user requests. • Would not resolve all underlying reasons for concerns from users, but could provide them with more information for their analyses and any adjustments they want to make. • Disclosures are not without challenges: ○ commercial sensitivity (especially for disaggregation); ○ boundary—not all requested information belongs in financial statements; and ○ risk of changes if requirements are developed before other work streams are completed. • Improved information about intangible assets could lead to increased appetite for broader recognition.

2—Same scope as Option 1, but start later Pursue a comprehensive disclosure work stream, but start later.	• Avoids treating disclosure as a substitute for definition or recognition improvements and reduces risk of further disclosure changes once other work concludes. • Informed by: ○ definition and recognition discussions; and ○ implementation effects of newer reporting requirements (IFRS 18 <i>Presentation and Disclosure in Financial Statements</i>, IFRS S1 <i>General Requirements for Disclosure of Sustainability-related Financial Information</i> and IFRS Practice Statement 1 <i>Management Commentary Practice Statement</i>). • Defers response to topic with strong demand.
3—Integrated recognition and disclosure assessment	• See Option 3 on Table A1 of this Appendix A to this paper.
4—Prioritise discrete disclosure improvements now and consider other improvements later • Prioritise some discrete disclosure improvements, such as linking narrative reporting to financial statements. • Consider other improvements later (after other work streams sufficiently progress).	• Could draw on the IASB’s previous experience on improving linkage. • Could deliver early, targeted benefits. • Maintains momentum on a high-demand area while keeping the broader package informed by other work streams. • Determining the scope of potential discrete improvements could be challenging.
Staff leaning	Option 2: • mainly to allow for this stream to be informed by the definition and recognition work (that is, to have a chance to resolve some of the underlying reasons for users’ concerns).

Table A3—Accounting for intangible assets held for investment

User feedback	- Limited direct evidence and topic-specific comments—possibly because discussions focused on intangible activities (not intangible asset types) and such assets may be less common in the selected sectors. - We think it might still be useful to explore the topic: users seek to understand how intangible assets drive future cash flows and overall performance—accounting based on how assets are used could help.
Options for exploring	Staff commentary, including on timing
1—Broad ‘by use / purpose’ exploration Use a principle-based approach based on the use or purpose of holding an asset. Test cases to explore potential solutions could include some carbon credits, cryptocurrencies and other assets.	- Aims for a principle-based solution that could help future proof the Standard. - Would not resolve all issues related to cryptocurrencies and carbon credits (for example, how to account for the obligation side for carbon credits). - The IASB would benefit from starting this later to allow it to consider both the work on the definition of an intangible asset and the outcome of any decisions related to adding potential projects for cryptoassets or pollutant pricing mechanisms before the next agenda consultation.
2(a)—Split / defer - Consider cryptocurrencies and carbon credits outside the Intangible Asset project (if resources become available before, or if there is sufficient demand in, the next agenda consultation). - Broader ‘held for investment’ topic is explored towards the end of the Intangible Asset project.	- Most commonly raised issues on these types of intangible assets related to cryptocurrencies and carbon credits: - separate projects would allow the IASB to more comprehensively consider those issues (or focus on the key issues) and draw on asset-specific requirements by other standard-setters. ‘By use/purpose’ consideration could future proof the Standard to cover any other intangible assets held for investment: - this would be done later in the project if we identify examples of such assets and issues related to them.

2(b)—Split / stop - Consider cryptocurrencies and carbon credits outside the Intangible Asset project (as in 2(a)). - No further work on ‘intangible assets held for investment’ in the Intangible Assets project.	- Would deal with most commonly raised issues (that related to cryptocurrencies and carbon credits rather than other assets held for investment). - Remove the broader ‘by use/purpose’ exploration as no sufficient demand and the main (IAS 38) issues we heard regarding these assets would be dealt with in the separate projects.
Staff leaning	Option 1: - strongly supported topic in initial outreach; - a principle-based ‘by use/purpose’ approach could help future-proof IAS 38; and - a later start would allow the IASB to consider the definition work and the outcome of any decisions on potential projects for cryptoassets or pollutant pricing mechanisms.

Table A4—Improving the comparability of information

User feedback	- Many users raised comparability concerns; strength of sentiment depends on valuation approach—more prominent for multiples/return on invested capital (ROIC)-type analysis and less significant for cash-flow-anchored analysis. - Users' concerns focus on: (i) comparing organically growing versus acquisitive entities and (ii) usefulness of information about intangible assets recognised in a business combination, especially post-acquisition—with requests mainly for disclosure/presentation improvements rather than a clear call to change the accounting model for acquired intangible assets.
Concerns	Staff commentary, including on timing
1—Comparing organically growing versus acquisitive entities	- The differences in accounting for internally generated intangible assets and those acquired through business combinations drive time-consuming user adjustments. - Improving disclosure on both internally generated and acquired intangible assets could provide better information for users' analyses and also help them make the adjustments they want to make. - Feedback in the initial phase of the project indicated mixed views of whether (and how) the comparability problem could be solved (recognising more internally generated intangible assets, recognising fewer intangible assets in a business combination or improving disclosure requirements). Therefore, it could be more beneficial to explore this topic after other topics (especially disclosure and recognition) have made sufficient progress and the IASB can consider whether any changes proposed in those topics have addressed users' comparability concerns.

2—Usefulness of information about intangible assets recognised in a business combination

- Users want more decision-useful information on acquired intangible assets to understand purchase price allocation (PPA) outcomes and post-acquisition performance and, in some cases, to make adjustments.
- Possible ways forward could be:
 - improve the usefulness of information about intangible assets acquired in a business combination within the scope of this project: focusing on improving disclosure requirements and considering the extent of intangible assets recognised in a business combination. Beneficial to consider this later in the project once other workstreams have progressed sufficiently. This may also allow for the results of the agenda consultation to be considered (see next bullet).
 - use the next agenda consultation to determine whether there is significant support for a broader review of business combination accounting in IFRS 3—this would be outside the scope of this project since it is a broader issue than intangible assets.

Staff leaning

- keep this topic as a later-stage topic, to allow the IASB to consider progress on the disclosure work stream and any other developments (for example, agenda consultation).

Table A5—Reporting a broader range of intangible items in the financial statements

User feedback	• Users consider some broader intangible items (for example, management reputation and track record; employees' expertise) in valuation, but feedback shows no significant demand to report these in the financial statements; only a few asked for metrics in the financial statements. • Some users view analysing these broader factors as part of their own role; one CMAC member suggested considering whether financial statements, management commentary and sustainability-related information 'as a package' helps explain value creation.
Staff commentary, including on timing	• No indication the IASB needs to change its approach and include reporting a broader range of intangible items as a work stream at this stage of the project. This would allow the IASB to consider the effects of work on other topics, progress in related IFRS Foundation activities and the developing practice of applying IFRS S1.
Staff leaning	• not elevating this topic to a work stream at this stage. We will keep monitoring the developments in the International Sustainability Standards Board's (ISSB's) work and considering connections between information in financial statements and information in other reports, such as management commentary and sustainability-related disclosures.

Table A6—Other topics

Potential changes to some aspects of the definition and recognition requirements	
User feedback	• Additional feedback broadly aligns with earlier outreach; users flag unclear or inconsistent outcomes for newer types of intangible assets. • A few requests to revisit aspects of the model (for example, control; treatment of ‘investment-like’ spend) support continuing our initial work stream.
Staff commentary and leaning	• The feedback confirms the IASB’s work on the work stream exploring some aspects of the definition and recognition requirements could be beneficial to users. • Progress the work stream as planned.
Improving measurement of intangible assets	
User feedback	• Findings still suggest no need for a standalone measurement topic; issues arise mainly within other topics (for example, useful lives and methods of amortisation). • A few users cautioned against fair value for internally generated intangible assets (because of subjectivity, auditability and manipulation concerns).
Staff commentary and leaning	• Continue to address measurement issues where they arise in other streams, consistent with the original plan. • No separate measurement work stream.

Improving consistency of labels for different intangible items

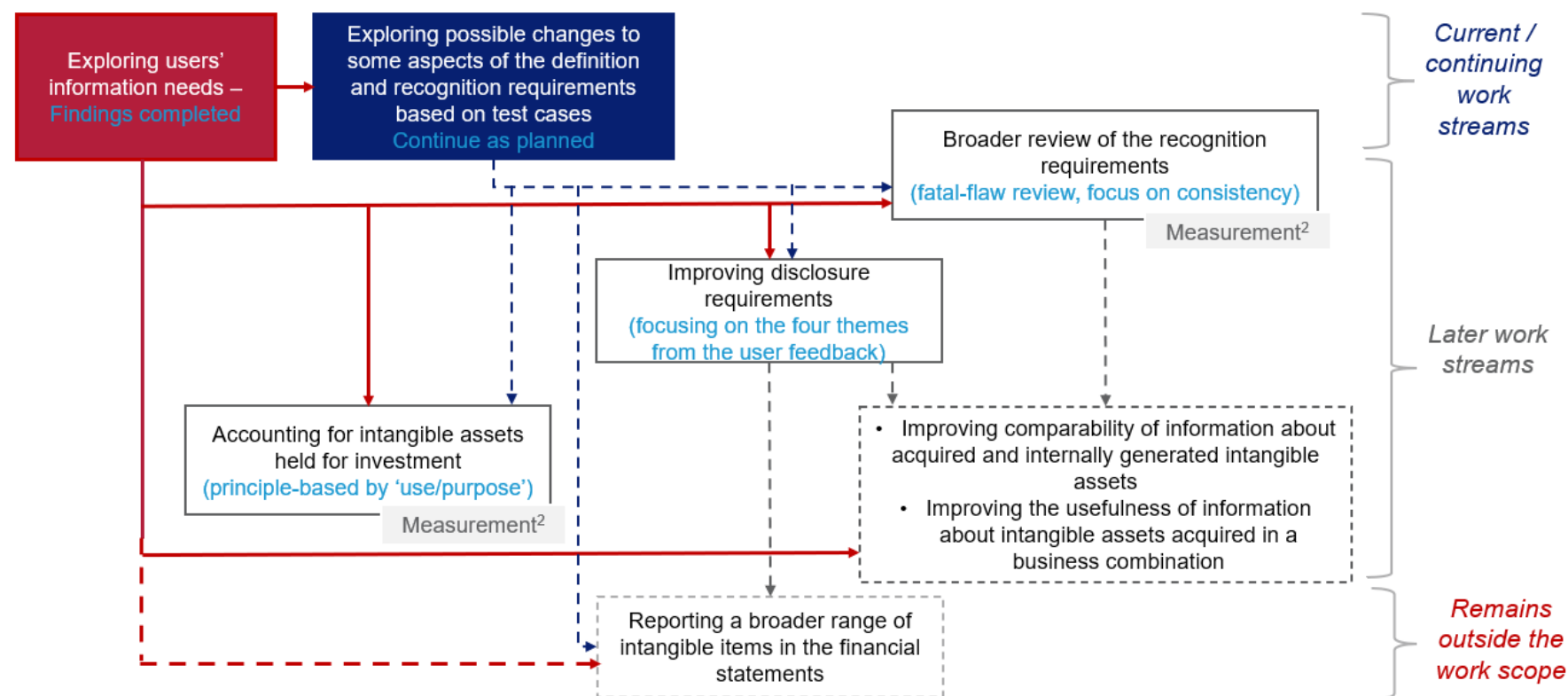
User feedback	• A few users raised specific concerns about inconsistent labelling and definitions (for example, advertising and marketing spend).
Staff commentary and leaning	• Findings still suggest no case for a separate topic. • Using clear terminology remains a standard consideration and we could consider whether targeted guidance is needed where specific issues are identified. • Do not elevate; address within the disclosure work stream as needed.

Exploring the accounting for intangible assets covered by other IFRS Accounting Standards

User feedback	• We received no evidence suggesting IASB should revisit the earlier decision not to explore these items.
Staff commentary and leaning	• Maintains scope discipline; revisit only if later decisions create a clear interaction needing attention. • Keep out of scope (no change).

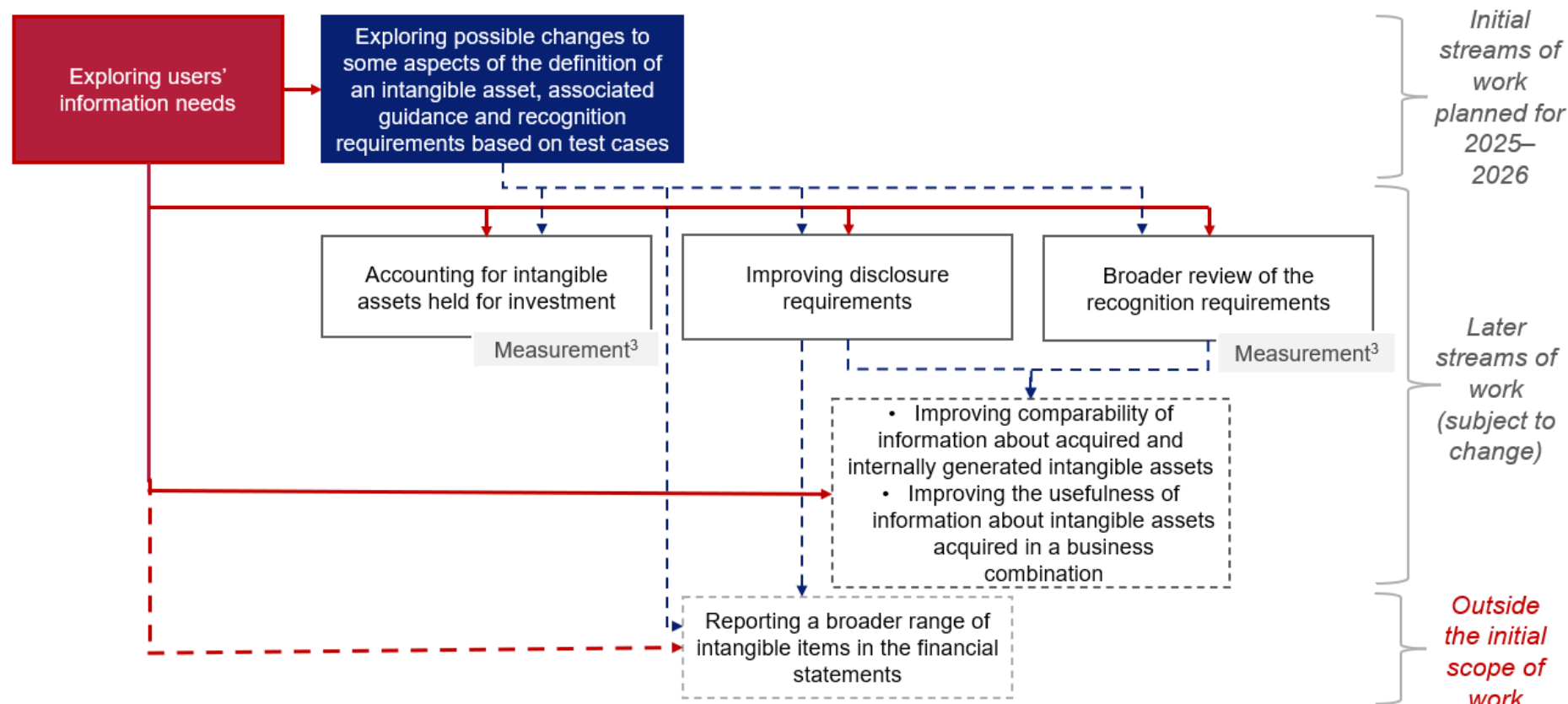
A2. Figure A1 provides a visual overview of the staff leanings on project direction presented to consultative groups.

Figure A1—Visual overview of the staff leanings on project direction



² No separate work stream—address measurement issues as they arise within other work streams.

Appendix B—IASB May 2025 decisions on project direction



³ No separate work stream—address measurement issues as they arise within other work streams.