EMJ.LIFE | PRE-DISCLOSURE INFRASTRUCTURE

RESPONSE TO THE IASB

PROPOSED IFRS ACCOUNTING TAXONOMY UPDATE

IFRS Accounting Taxonomy 2025 - Update 1
General Improvements

SUPPORT WITH TARGETED RECOMMENDATIONS

Submitted by EMJ LIFE HOLDINGS PTE. LTD.

Singapore | 13 August 2026

Traceable. Contestable. Version-governed. Independently assessable.

Response Overview

Consultation	Proposed IFRS Accounting Taxonomy Update - General Improvements
Reference	IASB/PTU/2026/1
Respondent	EMJ LIFE HOLDINGS PTE. LTD., Singapore
Overall position	Support with targeted recommendations
Submission date	13 August 2026
Comment deadline	7 September 2026

Executive Summary

CORE CONCLUSION

Taxonomy simplification should reduce tagging burden without erasing the machine-readable lineage between disclosure requirements, deprecated elements, successor elements and historical reported information.

EMJ LIFE HOLDINGS PTE. LTD. supports the IFRS Foundation's objective of improving the clarity, usability and consistency of the IFRS Accounting Taxonomy. Categorising text block elements and applying a more selective policy to narrative elements can make the Taxonomy easier for preparers to navigate and can improve the usefulness of digitally reported information.

Our principal concern is not with simplification itself, but with the possibility that simplification could cause an irreversible loss of evidence resolution. The proposed deprecation of approximately 400 narrative elements, combined with the creation of approximately 100 broader narrative elements, creates a transition challenge for preparers, users, software providers, regulators and analytical systems that depend on element-level and paragraph-level lineage.

We therefore recommend that the Foundation accompany the final Taxonomy Update with an authoritative, machine-readable transition layer. That layer should preserve predecessor-successor relationships, original paragraph and subparagraph references, mapping cardinality, effective versions and the reason for each change. It need not add large numbers of abstract context-marker elements to the primary presentation linkbase.

Summary of Positions

Question	Position	Principal recommendation
Q1	Agree, with recommendations	Make text-block categories and relationships explicitly machine-readable, not dependent only on labels.
Q2(a)	Agree, subject to transition controls	Preserve lineage, historical comparability and jurisdiction-specific implementation needs.
Q2(b)(i)	Qualified disagreement	Do not remove subparagraph-level references from the authoritative machine-readable transition record.
Q2(b)(ii)	Agree, with clarification	Retain non-narrative children with explicit semantics and stable relationships.
Q2(c)	Alternative recommended	Use a separate context and transition layer instead of extensive abstract elements in the presentation linkbase.
Q3	Agree	Publish implementation notes for changed element types and categorical children.
Q4	Further recommendations	Strengthen version governance, cross-taxonomy alignment and implementation testing.

1. Institutional Profile and Scope of Response

EMJ LIFE HOLDINGS PTE. LTD. is a Singapore-based institutional technology company developing Evidence Infrastructure through EMJ.NEXUS. Our work focuses on connecting institutional claims to evidence that remains traceable, contestable, version-governed and capable of independent assessment across organisational and regulatory boundaries.

Our perspective is informed by implementation work involving structured disclosure requirements, taxonomy relationships, evidence mapping, version transitions and machine-readable publication governance. EMJ.LIFE is an IFRS Foundation ISSB and SASB Level III commercial licensee, a TNFD Forum member and a TISFD Alliance member. These credentials provide context for our work with sustainability-related information; they do not confer authority to interpret IFRS Accounting Standards or speak for the IFRS Foundation.

This response is therefore limited to digital reporting architecture, taxonomy usability, traceability, implementation continuity and the relationship between structured information and its source requirements. We do not express views on accounting recognition, measurement or presentation requirements, and we do not claim to certify compliance or replace assurance.

2. Detailed Responses to Questions

Question 1(a) - Categorising text block elements

POSITION **Agree, with an implementation recommendation**

We agree with categorising text block elements into note, policy, table and detailed text block elements, and with amending labels to reflect those categories. The distinction should help preparers identify intended usage, reduce unnecessary extensions and improve consistency across filings.

However, the category should not be discoverable only by parsing the human-readable suffix in an element label. We recommend that the Foundation expose the category through an explicit, stable and machine-readable property or relationship in the Taxonomy package. This would allow filing tools, validation systems and analytical applications to apply the category consistently across languages and future label changes.

The guidance for table text blocks should also continue to distinguish conceptual dimensional structure from visual presentation. A table text block may represent information that is structurally tabular even when a preparer presents it narratively. Tooling should not infer the category solely from the visual format of the source report.

Question 1(b) - Documentation, guidance and parent-child relationships

POSITION **Agree, with safeguards against ambiguity**

We agree with adding prefixes to documentation labels, introducing guidance labels for note and policy text blocks, and representing parent-child relationships between closely related elements. These changes should improve element selection and help users identify broader and more specific disclosure containers.

We recommend that the Foundation clarify three implementation points:

- A parent-child relationship between text blocks indicates conceptual scope and discoverability; it should not automatically imply that both the broader and narrower text blocks must be tagged.
- Where a child may appear under multiple parents, the Taxonomy should make clear that the relationship is non-exclusive and should not be interpreted as a single reporting location requirement.
- The Contrast information and related-element relationships should be available in machine-readable form so that software does not need to extract semantics from documentation prose.

Question 2(a) - Applying the revised narrative element policy

POSITION **Agree with the objective, subject to a controlled transition architecture**

We agree that separate narrative elements should generally be retained or created only when the related information is expected to be separately understandable and readily identifiable. This can produce more coherent tagged information and reduce the effort required to isolate fragments that are not useful without surrounding context.

The application of this policy to existing elements nevertheless creates a significant version-transition event. Deprecating approximately 400 narrative elements is not merely a reduction in the number of tags. It changes the resolution at which disclosure requirements, reported facts and historical data can be connected.

We recommend that each deprecation decision be accompanied by an authoritative transition record identifying:

- the deprecated element and its last active Taxonomy version;
- the retained or newly created successor element or elements;
- whether the mapping is one-to-one, many-to-one, one-to-many or has no direct successor;
- all paragraph and subparagraph references previously associated with the deprecated element;
- the reason for the change, such as excessive detail, lack of separate understandability or lack of ready identifiability; and
- the effective Taxonomy version and any implementation note relevant to comparative data.

This transition information would support historical comparability without requiring the Foundation to retain every former element as an active tagging choice.

Question 2(b)(i) - References transferred to broader elements

POSITION **Qualified disagreement with the loss of subparagraph-level lineage**

We understand the rationale for assigning only a main-paragraph reference when a broader element represents the overall disclosure requirement. This can simplify the active reference structure and align the modelling approach with the IFRS Sustainability Disclosure Taxonomy.

We do not, however, support the complete disappearance of subparagraph references previously associated with deprecated elements from the authoritative machine-readable record. Paragraph 45 of the Proposed Update correctly notes that removing those links could reduce the ability of preparers and users to locate elements through specific subparagraph references and could affect tools that rely on detailed paragraph mapping.

RECOMMENDATION

Retain the main-paragraph reference on the active broader element where appropriate, while preserving inherited subparagraph references in an authoritative transition or reference layer that is distributed with the Taxonomy release.

This approach distinguishes active tagging architecture from evidence lineage. It allows the active Taxonomy to remain streamlined while ensuring that a user can still determine which detailed requirements were absorbed into a broader element. It also supports audit trails, regulatory overlays, historical series, automated mapping and retrieval systems.

Question 2(b)(ii) - Retaining non-narrative child elements

POSITION **Agree, with explicit relationship semantics**

We agree with retaining non-narrative elements as children of the broader narrative elements. Structured monetary, Boolean, categorical and other non-narrative facts should not be lost merely because their former narrative parent is deprecated.

The final materials should state clearly that retention of a non-narrative child does not mean the broader narrative element must always be tagged in order for the child fact to be valid, unless that dependency is intended. The relationship should also preserve applicable dimensions, reference roles and presentation context. This clarification would reduce divergent implementation by filing regimes and software providers.

Question 2(c) - Rejected abstract context-marker approach

POSITION **Do not populate the primary presentation linkbase extensively; preserve context through a separate layer**

We recognise the advantages identified for abstract context-marker elements, particularly searchability, alignment with specific disclosure requirements and support for machine-learning systems. We also recognise the disadvantages: abstract elements may not be visible in tagging tools, may increase maintenance and may create architectural differences between the Accounting and Sustainability Disclosure Taxonomies.

On balance, we do not recommend reinstating every deprecated narrative element as an abstract element in the primary presentation linkbase. We instead recommend a separate, authoritative context and transition layer distributed as part of the official Taxonomy package.

At minimum, that layer should be available in a machine-readable XBRL-compatible format and in a simple implementation format such as CSV. It should contain persistent identifiers, predecessor-successor relationships, original references, successor references, mapping cardinality, change reason, effective version and status. This would preserve context without expanding the set of taggable elements or overloading the presentation structure.

Question 3 - Other general improvements

POSITION **Agree**

We agree with the proposed categorical elements, targeted documentation-label amendments, creation of the additional text element and changes to element types described in paragraphs 55-61.

Categorical elements can improve structured analysis when the disclosure requirement genuinely represents a binary response or a choice from an identified set. Their use should remain tied to the meaning of the disclosure requirement rather than to a preference for increased structuring. For extensible enumerations, the final release should provide clear domain guidance and explain the treatment of entity-specific extensions.

For elements changing from text to text block, or from text to date, the transition package should identify the datatype change explicitly. Software providers and preparers may otherwise treat a same-label replacement as semantically identical while overlooking changes in validation, formatting or permitted content.

Question 4 - Further changes

POSITION **Six recommendations for the 2027 Taxonomy and future releases**

We recommend the following measures for the IFRS Accounting Taxonomy 2027 and future releases:

1. Publish an authoritative transition package. Provide machine-readable and human-readable mappings between deprecated, retained and newly created elements.
2. Preserve requirement lineage. Retain all absorbed paragraph and subparagraph references in a transition or reference layer even when active broader elements use only main-paragraph references.
3. Use persistent identifiers and explicit change metadata. Distinguish label changes, datatype changes, scope expansions, scope contractions, mergers and replacements.
4. Make modelling categories machine-readable. Expose note, policy, table and detailed text-block categories, together with relevant relationships, independently of language-specific labels.
5. Test transition effects with real implementation workflows. Include preparers, users, regulators, software providers and analytical systems, and test search, tagging, historical comparison and AI-assisted retrieval.
6. Align Accounting and Sustainability taxonomies at the governance layer. Consistency should cover not only modelling policy but also identifiers, reference preservation, version metadata, transition packages and machine-readable relationship semantics.

3. Proposed Transition Package

For clarity, we propose that the Foundation publish a compact transition package alongside the final update. The following fields would provide a practical minimum without changing the set of active taggable elements.

Field	Purpose	Example of controlled value
sourceElementId	Identifies the deprecated element	Stable QName / identifier
successorElementId	Identifies retained or new successor	One or more stable identifiers
mappingType	Explains cardinality	1:1, many:1, 1:many, none
changeType	Explains the technical change	merge, replacement, datatype change
changeReason	Explains the policy basis	not separately understandable
originalReferences	Preserves former requirement lineage	Main and subparagraph references
successorReferences	Records active references	Current main/subparagraph references
effectiveVersion	Controls when the change applies	IFRS Accounting Taxonomy 2027
implementationNote	Supports tools and comparative data	Short controlled explanation

4. Closing Remarks

The Foundation's proposals respond to a genuine implementation challenge: excessive narrative granularity can increase tagging effort without producing information that users can understand or analyse independently. We support the direction of travel and the objective of a more coherent Taxonomy.

The transition should nevertheless be governed as a change in evidence architecture, not only as a reduction in element count. A broader narrative element can become the appropriate active tagging container while the lineage of the detailed requirements it absorbs remains available through controlled metadata.

This distinction would allow the IFRS Accounting Taxonomy to become simpler for preparers without becoming less traceable for users, regulators, assurance providers, software systems and future analytical applications.

CLOSING PRINCIPLE

Simplify the active tagging surface. Preserve the institutional lineage underneath it.

Appendix A - Response Matrix

Item	Position	Rationale	Requested action
Q1(a)	Agree	The categories improve selection and consistency.	Expose category through a stable machine-readable property.
Q1(b)	Agree	Guidance and hierarchy improve discoverability.	Clarify non-exclusive and non-duplicative relationship semantics.
Q2(a)	Conditional support	Broader narratives can improve coherence, but deprecation changes evidence resolution.	Publish element-level transition records.
Q2(b)(i)	Qualified disagreement	Removing detailed references impairs lineage and paragraph-based retrieval.	Preserve absorbed subparagraph references outside the active tagging surface.
Q2(b)(ii)	Agree	Structured child facts remain useful.	Clarify dependencies and preserve dimensions and references.
Q2(c)	Alternative	Abstract markers offer context but may burden presentation architecture.	Publish a separate official context and transition layer.
Q3	Agree	The targeted changes improve structured representation.	Identify datatype and domain changes in implementation metadata.
Q4	Further action	Future usability depends on controlled migration and cross-taxonomy governance.	Adopt the six recommendations in Section 2.

Appendix B - Publication and Submission Boundary

This response is an independent submission by EMJ LIFE HOLDINGS PTE. LTD. It is not issued, reviewed or endorsed by the IFRS Foundation, the IASB, the ISSB, TNFD or TISFD. References to institutional memberships or commercial licensing describe the respondent's operating context only.

EMJ.LIFE does not determine compliance with IFRS Accounting Standards, certify the correctness of digital filings, replace audit or assurance, or speak on behalf of any standard setter or regulator. The recommendations in this response concern taxonomy architecture, evidence traceability and implementation governance.

Source Document

IFRS Foundation, Proposed IFRS Accounting Taxonomy Update: IFRS Accounting Taxonomy 2025 - Update 1, General Improvements, IASB/PTU/2026/1, June 2026. Comments due 7 September 2026.

Official consultation page: https://www.ifrs.org/projects/open-for-comment/