

Staff paper

Agenda reference: 3

Emerging Economies Group meeting

Date **December 2024**

Project Post-implementation Review (PIR) of IFRS 16 Leases

Topic Phase 1-Identifying matters to be examined

Contacts Tim Craig (tcraig@ifrs.org)

Megumi Makino (megumi.makino@ifrs.org)

Raf Markowski (rmarkowski@ifrs.org)

This paper has been prepared for discussion at a public meeting of the Emerging Economies Group (EEG). This paper does not represent the views of the International Accounting Standards Board (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*.



Purpose of this session

- To share your views on the implementation and ongoing application of IFRS 16 Leases.
- To help the IASB scope a request for information (RFI)—that is, to identify matters to include in the RFI for public consultation.

Contents

	from slide
Questions	3
PIR process	5
Background to IFRS 16	9
Expected effects of IFRS 16	13
Detailed information to support outreach	20
Appendix A—IFRS 16 vs. US GAAP (Topic 842)	31



Questions (overall assessment and effects)

1

What is your **overall assessment** of IFRS 16? Are there any fundamental questions ('fatal flaws') about the clarity and suitability of core objectives or principles that indicate the requirements are not working as intended?

Slide 10 describes the objective of IFRS 16.

2

The <u>Effects Analysis</u> accompanying IFRS 16 describes the likely costs and benefits (effects) of IFRS 16.

- a) Have actual **ongoing costs and benefits** significantly differed from the expected effects? If so, please explain why.
- b) Were the **implementation costs** significantly different from those expected?
- c) How challenging was **transition** to IFRS 16? What transition requirements were helpful and would you recommend the IASB do anything differently in future standard-setting projects?

Slides 13–19 describe the expected effects of IFRS 16. Slide 29 provides an overview of transition methods.



Questions (application questions)

3

Are there application questions that the IASB or the IFRS Interpretations Committee (Committee) needs to answer **urgently** or endeavour to start working on **before** the next five-yearly agenda consultation or **consider** in the next five-yearly agenda consultation?

For each matter raised, please explain whether:

- it has substantial consequences (for example, there is widespread diversity in practice that materially affects users of financial statements' ability to analyse trends and compare entities).
- it is pervasive (for example, it affects transactions that occur frequently in various industries and jurisdictions).
- it can be addressed by the IASB or the Committee. Please describe your suggested solution.
- the benefits of any action are expected to outweigh the costs (considering the extent of disruption to current practice, operational costs from change, and the importance of the matter to users of financial statements).

Please also explain how the matter is being addressed in practice today and whether, in your view, the question is appropriate for submission to the Committee.

Slide 7 describes the prioritisation framework. Slides 20–30 provide an overview of IFRS 16 topic areas.





PIR—what is the objective?



To **assess** whether the **effects** of applying new requirements on users of financial statements, preparers, auditors and regulators are **as intended** when the IASB developed those new requirements

Overall, are the requirements working as intended?

Fundamental questions (ie 'fatal flaws') about the core objectives or principles—their clarity and suitability—would indicate that the new requirements are not working as intended

Are there specific application questions?

Specific application questions would not necessarily prevent the IASB from concluding that the new requirements are working as intended, but may nonetheless need to be addressed if they meet the criteria for whether the IASB would take further action



PIR—how does the IASB respond to identified matters?

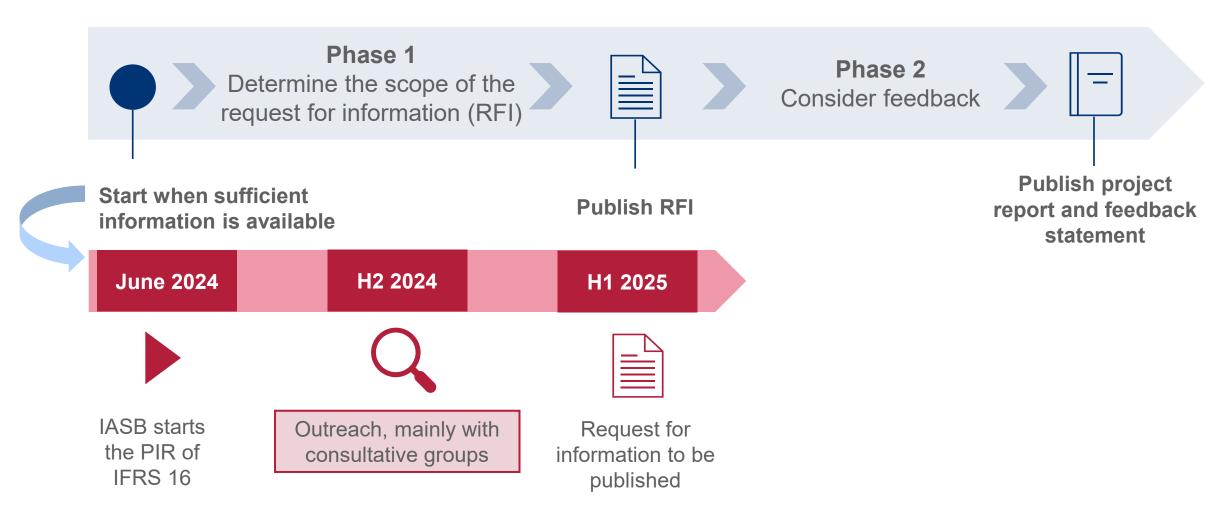
- Consider <u>whether</u> to take action, based on the extent to which:
 - the **objective** of the new requirements is not being met
 - benefits to users are significantly lower than expected
 - costs of application are significantly higher than expected
- Determine the <u>prioritisation</u> of the matters based on the extent to which:
 - matter has substantial consequences
 - matter is **pervasive**
 - matter relates to an issue that can be addressed by the IASB or the Committee
 - the benefits of any action would be expected to outweigh the costs

most To address as soon as possible High priority Matter relates to core objective or principles Solution needed urgently most To endeavour to start before Medium priority next agenda consultation some To obtain more information in Low priority next agenda consultation few or none Matters requiring no further action

Determining the <u>timing</u> of taking action



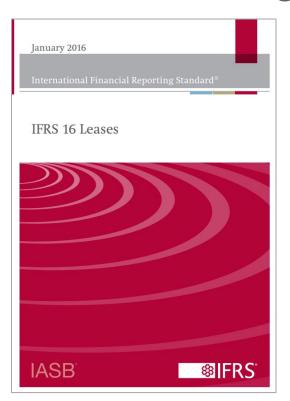
PIR—what is the process and where are we?

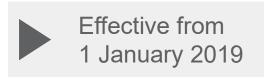






IFRS 16 at a glance







To ensure that lessees and lessors provide relevant information in a manner that faithfully represents leases. This information gives a basis for users of financial statements to assess the effect that leases have on the financial position, financial performance and cash flows of an entity.

- Replaced IAS 17 Leases
- Brings almost all leases onto the balance sheet of lessees
- Significant change for lessees; little change for lessors
- Enhanced disclosure requirements



What has changed for lessees?

Financial position

	IAS	IFRS 16	
	Finance leases	Operating leases	All leases
Assets	→ m		ナナ 章 黒
Liabilities	\$\$		\$\$\$\$\$\$\$
Off balance sheet rights / obligations*		₩ ₩ → ↑↑↑↑↑	

^{*}According to the Effects Analysis, listed entities using IFRS or US GAAP disclosed almost US\$3 trillion of off balance sheet lease commitments.

Financial performance

	IAS	IFRS 16	
	Finance Operating leases		All leases
Revenue	Х	Х	Х
Operating costs (excl. depreciation and amortisation)		Single expense	
EBITDA			仓仓
Depreciation and amortisation	Depreciation		Depreciation
Operating profit			Û
Finance costs	Interest		Interest
Profit before tax			⇔



Activities since IFRS 16 was issued

A solid foundation for the PIR

The IASB, together with the Committee, has put significant efforts into monitoring and supporting the implementation and application of IFRS 16



Issued amendments to IFRS 16 to address some of the matters raised by stakeholders:

- May 2020—Covid-19-Related Rent Concessions
- August 2020—Interest Rate Benchmark Reform—Phase 2
- March 2021—Covid-19-Related Rent Concessions beyond 30 June 2021
- September 2022—Lease Liability in a Sale and Leaseback
- minor consequential amendments from other standards



Provided <u>educational</u> <u>materials</u> such as articles and webcasts



Analysed application questions and issued nine agenda decisions





Expected effects—an overview

The IASB expected the benefits of IFRS 16 to **outweigh** the costs



Improved comparability

- Implementation costs
- Ongoing costs

COSTS









Expected benefits—quality

Improved information available to all users of financial statements.

Improved quality of financial reporting



More faithful representation of an entity's assets and liabilities and greater **transparency** about the entity's financial leverage and capital employed. Previously only more sophisticated investors and analysts adjusted for off balance sheet leases, while others did not.



Reduced need for investors and analysts to **adjust** amounts reported on a lessee's balance sheet and income statement.



Reduced need for entities to provide **non-GAAP** information* about leases—IFRS 16 provides a richer set of information than was previously available, giving further insight into a lessee's operations and funding.



Improvements in how lessees manage their lease portfolios, and possible improvements in how some lessees finance and operate their **businesses**.

^{*}Also referred to as APMs—alternative performance measures or MPMs—management-defined performance measures.



Expected benefits—comparability

Improved comparability between entities



Improved **comparability** between entities that lease assets and entities that borrow to buy assets, while also reflecting the economic differences between these transactions.



Better information about changes in an entity's financial **flexibility** when it extends or shortens the length of its leases.



Reduced opportunities for entities to **structure** leasing transactions to achieve off balance sheet accounting.



Reduced incentive for entities to enter into **sale and leaseback** transactions only for accounting purposes, because of the recognition of assets and liabilities arising from the leaseback and the restriction on any gain recognised on sale of an asset.



Expected implementation costs



Preparers



- the size of an entity's lease portfolio
- the terms and conditions of those leases
- place to account for leases applying IAS 17



Users

Set up of systems and processes

Determination of

Communication and

discount rates

education



the systems already in

Education and updates to methodologies to analyse financial statements



Regulators, tax authorities

Costs relating to IFRS 16 if the respective regulations depend on the accounting in IAS 17

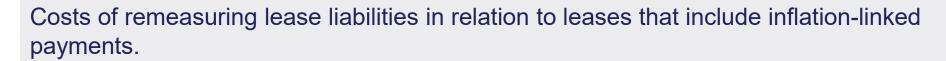


Expected ongoing costs

Except for discount rates, the data required to apply IFRS 16 is similar to that required to apply IAS 17. Once an entity has updated its systems, the IASB expects costs to be only marginally higher compared to those incurred when applying IAS 17.









Reduced costs because a lessee is no longer required to classify leases as finance leases or operating leases.









Key cost reliefs

Recognition exemptions

Short-term leases

Leases of low-value assets

- Expense in profit or loss
- Disclose, if material

Simplifications and practical expedients

Combining lease and services

Measurement

Transition

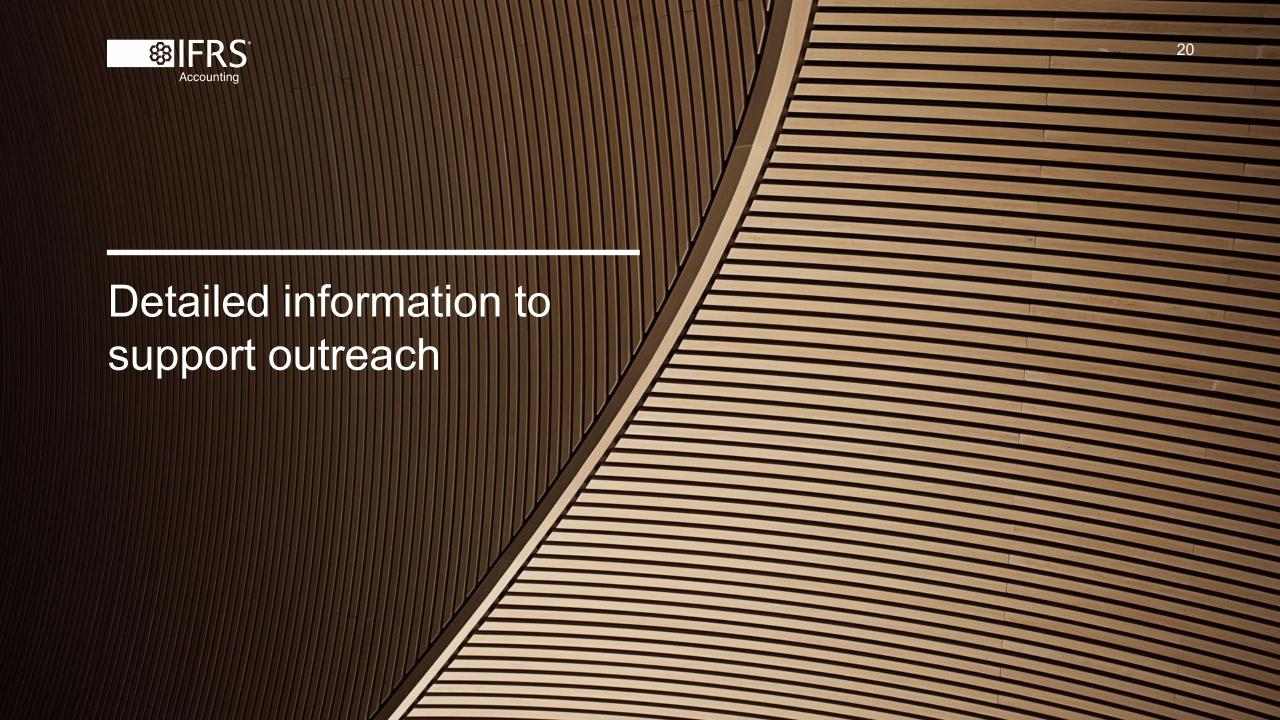
Variable lease payments (other than inflation-linked) excluded

Optional payments included when reasonably certain

Measurement of lease assets relating to former off balance sheet leases

Comparative amounts

Leases ending within 12 months of the date of initial application





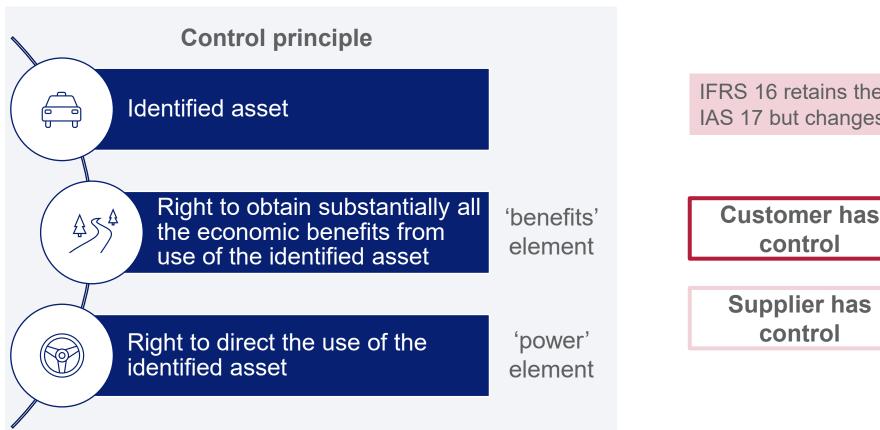
IFRS 16—topic areas

1 Identifying a lease
2 Lease term
3 Lessee
4 Lessor
5 Sale and leaseback transactions
6 Transition
7 Interaction with other IFRS Accounting Standards



1. Identifying a lease

Right to **control the use** of an identified asset for a period of time in exchange for consideration.



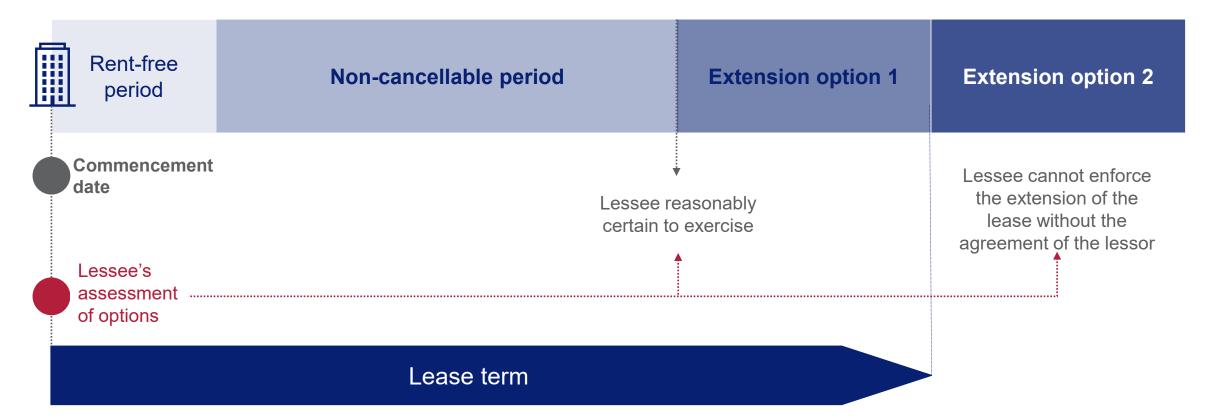
IFRS 16 retains the definition of a lease in IAS 17 but changes the application guidance.





2. Lease term

The non-cancellable period for which a lessee has the right to use an underlying asset together with periods covered by an extension (or termination) option if the lessee is reasonably certain to exercise (or not to exercise) that option.





3. Lessee—initial measurement

Right-of-use asset

Lease liability

Decommissioning or restoration costs

Initial direct costs

Payments at or before commencement date (less incentives received)

Initial measurement of lease liability

Discount using rate implicit in the lease or incremental borrowing rate

Present value of lease payments = lease liability

Lease payments during the lease term

Other variable lease payments (recognised in profit or loss)

Optional payments

(that are reasonably certain to occur)

Residual value guarantees

Variable lease payments (linked to an index or a rate)

Fixed payments

(and in-substance fixed) less incentives receivable



3. Lessee—subsequent measurement

Right-of-use asset

Cost model

Revaluation model

Fair value model (investment property)

Lease liability

Increase the carrying amount to reflect interest on the lease liability

Reduce the carrying amount to reflect the lease payments made

Remeasure the carrying amount to reflect any **reassessment** or **lease modifications** (unless a lease modification is accounted for as a separate lease)



Lease modification—a change in the scope of a lease, or the consideration for a lease, that was *not part of the original terms and conditions* of the lease.

Reassessment—reflects a change in (1) the lease term, (2) the assessment of an option to purchase, (3) the residual value guarantee or (4) future lease payments that depend on an index or a rate.



3. Lessee—disclosures

Objective: to disclose information that, together with the information provided in the primary financial statements, gives a basis for users to assess the effect that leases have on the financial position, financial performance and cash flows of the lessee.



Quantitative and qualitative information that would satisfy the objective

- Breakdown of lease-related expenses
- Total cash outflow for leases
- Information about right-of-use assets by class of asset being leased
- Maturity analysis of the lease liabilities
- Gains or losses from sale and leaseback transactions
- Income from subleasing



- The nature of the lessee's leasing activities
- The effect of extension and termination options, or variable lease payments, on future cash outflows to which the lessee is potentially exposed





4. Lessor

Substantially no change to lessor accounting compared to IAS 17. Disclosure is enhanced.

Dual classification model

Finance lease

Operating lease

Subleases—Intermediate lessor

Account for head lease and sublease as two separate contracts

Classify a sublease with reference to the rightof-use asset arising from the head lease

Enhanced disclosures

Maturity analysis of lease payments in each of the first five years

Separate disclosures for leased assets and assets used by a lessor

Information about residual asset risk

Components of lease income in the period



5. Sale and leaseback transactions

Does the transfer of an asset satisfy the requirements in IFRS 15 Revenue from Contracts with Customers to be accounted for as a sale of the asset?

Transfer of the asset is a sale

Seller-lessee

- Measure the right-of-use asset at the proportion of the previous carrying amount of the asset that relates to the rights **retained**.
- Recognise any gain or loss that relates to the rights transferred.

Buyer-lessor

- Recognise the transferred asset applying applicable Accounting Standard.
- Apply lessor accounting requirements in IFRS 16.

- Transfer of the asset is *not* a sale
- Continue to recognise the transferred asset.
- Recognise a financial liability equal to the transfer proceeds and apply IFRS 9.
- Do not recognise the transferred asset.
- Recognise a financial asset equal to the transfer proceeds and apply IFRS 9.



6. Transition

	Full retrospective	Retrospective with the cumulative effect recognised at the date of initial application	
Definition of a lease	An entity permitted to apply IFRS 16 to contracts previously identified as leases and not to apply IFRS 16 to contracts that were not previously identified as leases.		
Comparative information	Applying IFRS 16.	Applying IAS 17.	
Right-of-use assets (ROU) and lease liabilities at the date of initial application	As if IFRS 16 had always been applied.	 Previous operating leases ROU measured (1) as if IFRS 16 had always been applied but using the lessee's incremental borrowing rate (IBR) at the date of initial application; or (2) at an amount equal to the lease liability. Lease liability = remaining lease payments discounted using IBR at the date of initial application. Previous finance leases The carrying amount of the ROU and lease liability at the date of initial application = the carrying amount of the lease asset and lease liability immediately before that date measured applying IAS 17. 	
Disclosures	As required by paragraph 28 of IAS 8.	Same but instead of paragraph 28(f) of IAS 8 some additional information required.	

Lessors (except for intermediate lessors) not required to make any adjustments on transition.



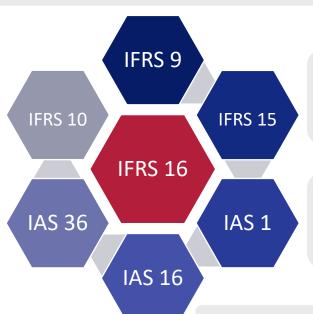
7. Interaction with other IFRS Accounting Standards

Examples

- Measurement of unguaranteed residual values and expected credit losses (ECL)
- Lessee accounting for lease payments forgiven

Sale and leaseback of an asset in a single-asset entity

Impairment testing of right-of-use assets, for example determining the cash flows to include and the appropriate discount rates to use



Assessment of whether the transfer of an asset is a sale in a sale and leaseback transaction

Presentation of the ECL allowance of a lease receivable in the statement of financial position

Distinguishing between a lease and a sale or purchase



Appendix A
IFRS 16 vs. US GAAP
(Topic 842)



IFRS 16 and Topic 842—comparison

			US GAAP (FASB model)	
		IFRS 16	Former ON balance sheet leases	Former OFF balance sheet leases
Statement of fir	nancial position			
	All leases on balance sheet	✓	✓	✓
Pagagnitian	Exemption for short-term leases	✓	✓	✓
Recognition	Exemption for leases of low-value assets	✓		
Measurement	Lease liabilities on a discounted basis	√ 1	√ 1	√ 1
	Initial right-of-use asset=lease liability	✓	✓	✓
	Depreciation of right-of-use assets	Typically straight-line	Typically straight-line	Typically increasing ²
Statement of pr	ofit or loss			
Operating costs		Depreciation	Depreciation	Single expense
Finance costs		Interest	Interest	
Statement of ca	sh flows			
Operating activities	ties	Interest 3	Interest	Interest and principal
Financing activity	ties	Principal	Principal	
Other main diff	erences			
Sale and leaseb	ack transactions	Partial gain or loss recognition	Full gain or loss recognition	
	ssification by an intermediate lessor as or finance lease	Determined by reference to the right-of-use asset	Determined by reference to the underlying asset	

- ¹ Lease liabilities are measured in the same way applying IFRS 16 and the FASB model, except that inflation-linked payments are reassessed when those payments change applying IFRS 16 but are not when applying the FASB model.
- ² Right-of-use assets are measured at an amount that achieves the recognition of a single lease expense typically on a straight-line basis.
- ³ Applying IAS 7 *Statement of Cash Flows*, interest payments can be presented within operating, investing or financing activities. IFRS 18 *Presentation and Disclosure in Financial Statements* has made limited changes to the statement of cash flows. IFRS 18 is effective from 1 January 2027.

IFRS 16 is the result of the joint project of the IASB and the FASB. Both boards reached different decisions about the lessee accounting model.



Follow us online



X @IFRSFoundation

▶ IFRS Foundation

International Accounting Standards Board

