

Staff paper

Agenda reference: 1

Islamic Finance Consultative Group meeting

Leases

Date	December 2024
Project	Post-implementation Review (PIR) of IFRS 16
Торіс	Phase 1-Identifying matters to be examined
Contacts	Tim Craig (<u>tcraig@ifrs.org</u>)

Rafal Markowski (<u>rmarkowski@ifrs.org</u>) Noor Nakato (<u>noor.nakato@ifrs.org</u>)

This paper has been prepared for discussion at a public meeting of the Islamic Finance Consultative Group (IFCG). 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)



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.



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)



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.



5

PIR process



PIR—what is the objective?

OBJECTIVE To assess whether the effects of applying new requirements on users financial statements, preparers, auditors and regulators are as intendee 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	

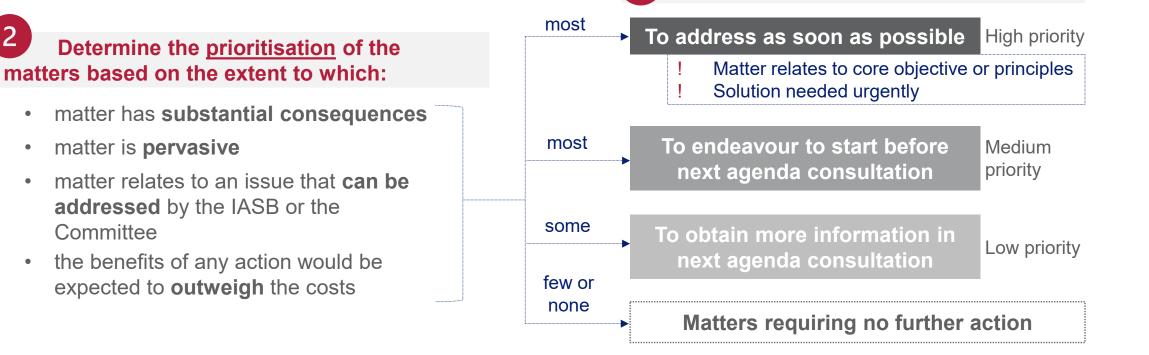


2

PIR—how does the IASB respond to identified matters?

Consider whether 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



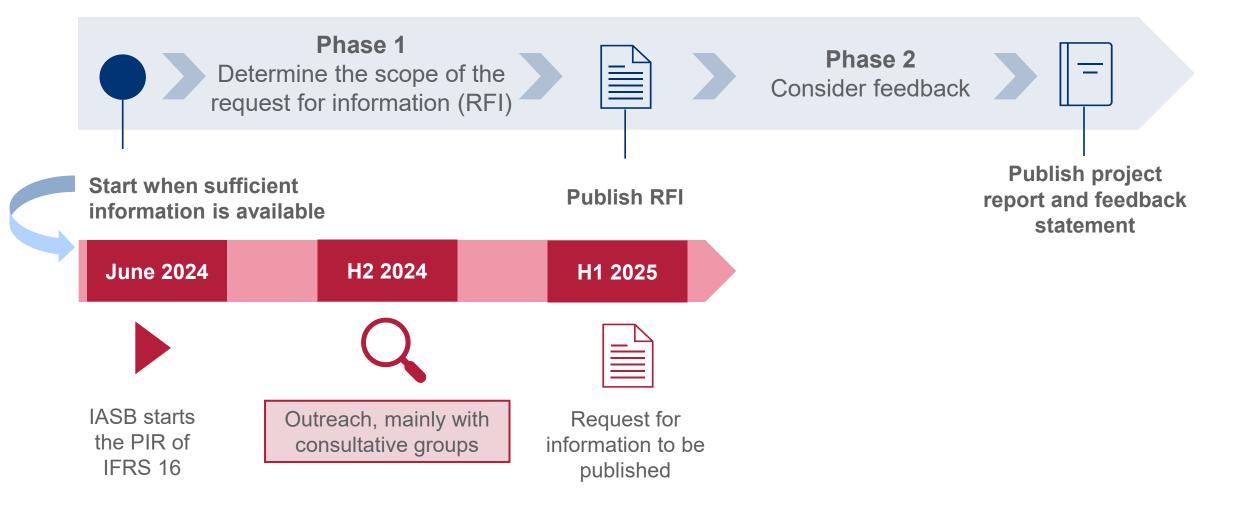
3

Determining the timing of taking action

7



PIR—what is the process and where are we?



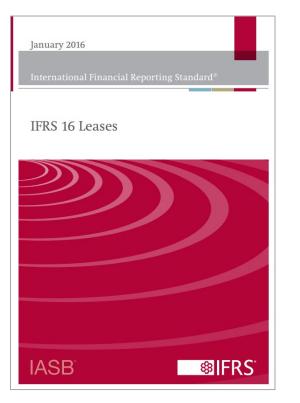


Background to IFRS 16

9



IFRS 16 at a glance





Effective from 1 January 2019



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	≁⋒		▶ ► ► ► ► ► ► ► ► ► ► ► ► ► ► ► ► ► ► ►
Liabilities	\$\$		\$\$\$\$\$\$
Off balance sheet rights / obligations*		₩ → mm \$\$\$\$\$	

*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 leases	Operatino leases	All leases
Revenue	Х	х	x
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



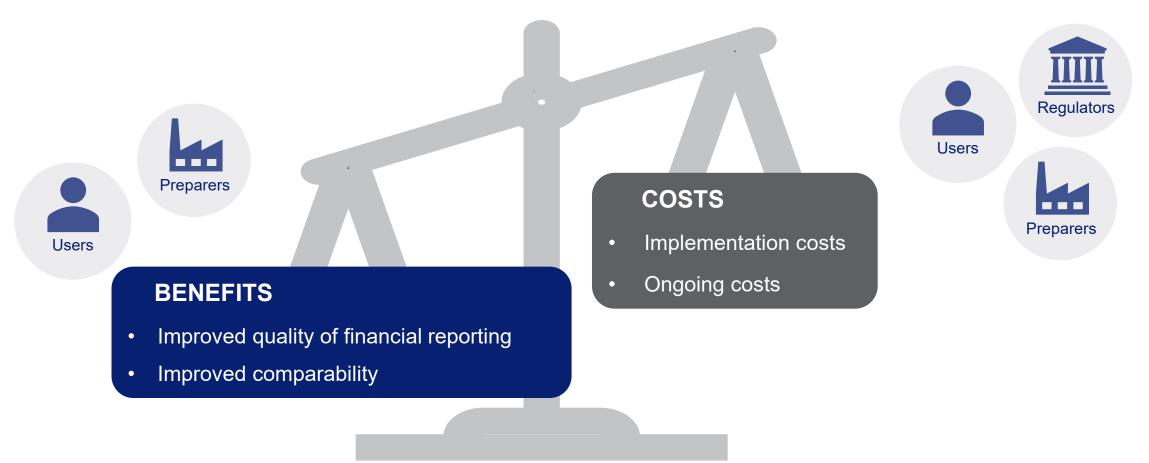
Expected effects of IFRS 16

13



Expected effects—an overview

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

Set up of systems and processes

Determination of discount rates



Communication and education



Depending on:

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

Users

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.



Costs to arise from determining discount rates for each new or modified lease.



Costs to arise from reassessment of the lease term—and thereby a reassessment of the discount rate and lease payments—after its initial determination when required by IFRS 16.



Costs of remeasuring lease liabilities in relation to leases that include inflation-linked payments.



Costs of applying the disclosure requirements in IFRS 16.



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

Combining lease and services

Simplifications and practical expedients

Variable lease payments (other than inflation-linked) excluded Measurement Optional payments included when reasonably certain Measurement of lease assets relating to former off balance sheet leases Transition Comparative amounts Leases ending within 12 months of the date of initial application

Expense in profit or loss

Disclose, if material

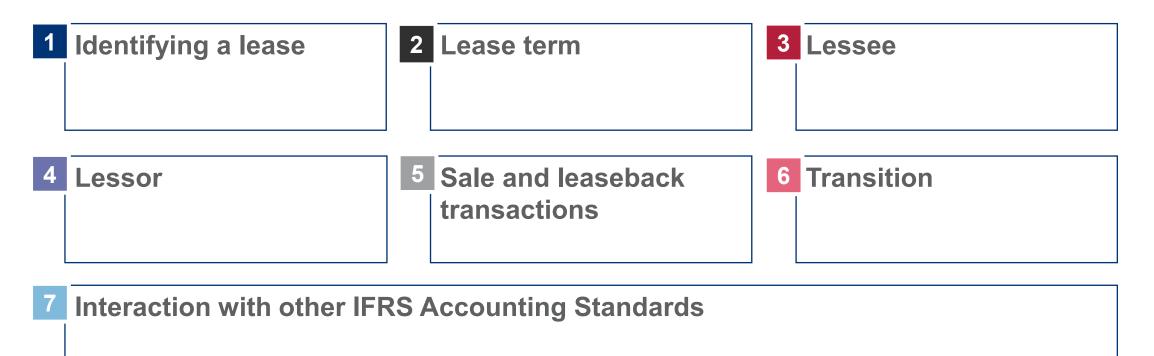


Detailed information to support outreach

20



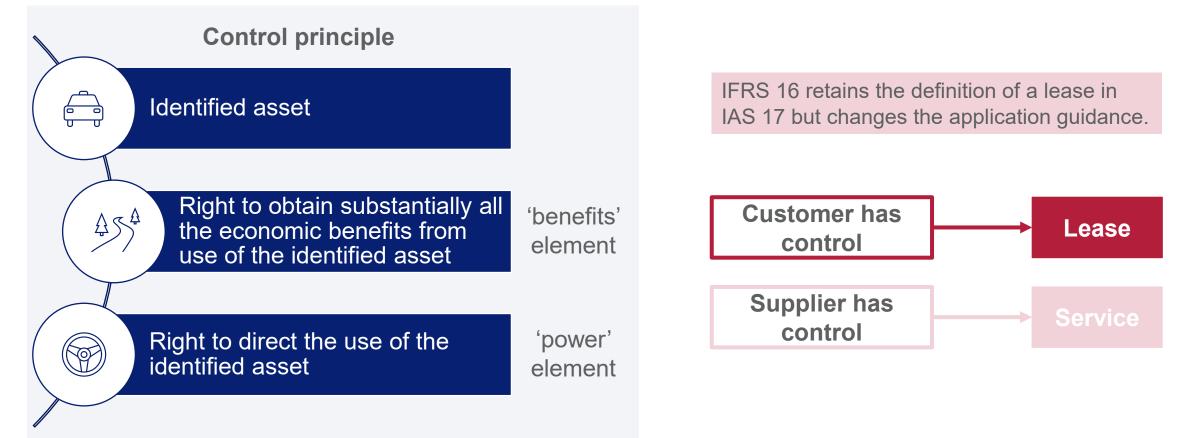
IFRS 16—topic areas





1. Identifying a lease

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





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.

Rent-free period	Non-cancellable period	Extension option 1	Extension option 2
Commencement date	Lessee re certain to	easonably exercise	Lessee cannot enforce the extension of the lease without the agreement of the lessor
of options	Lease term		



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)

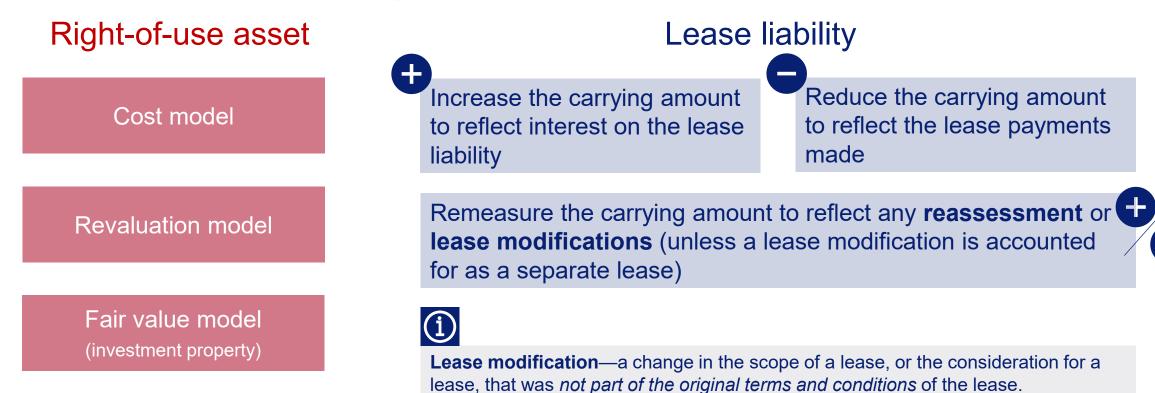
Residual value guarantees

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

Fixed payments (and in-substance fixed) less incentives receivable



3. Lessee—subsequent measurement



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

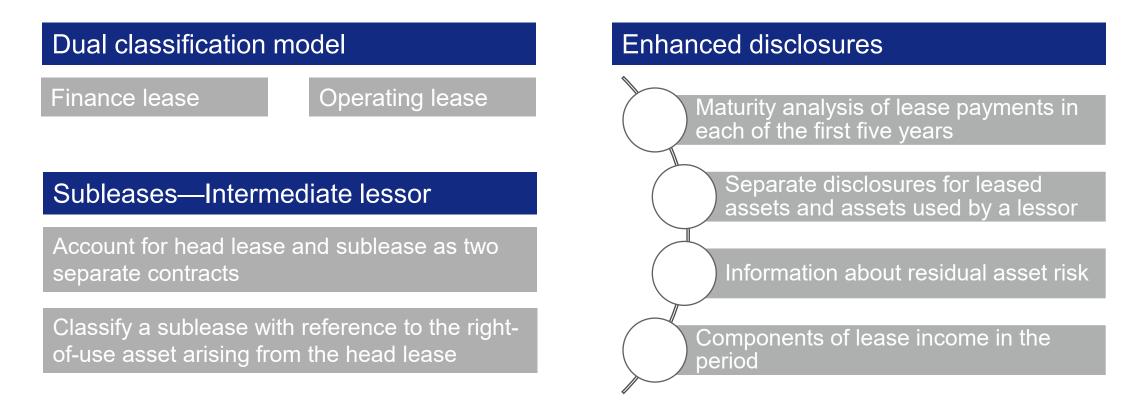
Objective: to disclose information that, together with the information provided in the primary financial statements, gives a basis for users to assess the effect that leases have on the financial position, financial performance and cash flows of the lessee.

Quantitative and qualitative information that would satisfy the objective Entity-specific additional information, for Breakdown of lease-related expenses example: Total cash outflow for leases The nature of the lessee's leasing Information about right-of-use assets activities by class of asset being leased The effect of extension and termination Maturity analysis of the lease liabilities options, or variable lease payments, on Gains or losses from sale and future cash outflows to which the leaseback transactions lessee is potentially exposed Income from subleasing



4. Lessor

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





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?

Buyer-lessor

Sel	ler–	less	ee

Transfer of the asset is a sale	 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. 	 Recognise the transferred asset applying applicable Accounting Standard. Apply lessor accounting requirements in IFRS 16.
Transfer of the asset is <i>not</i> 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.

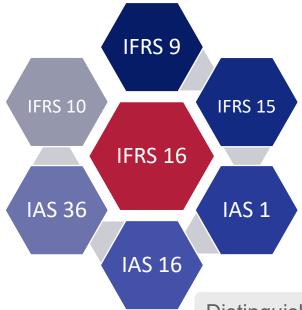


7. Interaction with other IFRS Accounting Standards Examples

- 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	\checkmark	\checkmark	✓
	Exemption for short-term leases	√	\checkmark	√
Recognition	Exemption for leases of low-value assets	√		
	Lease liabilities on a discounted basis	√ 1	√ 1	√ 1
Measurement	Initial right-of-use asset=lease liability	√	\checkmark	\checkmark
	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	ish flows			
Operating activi	ties	Interest ³	Interest	Interest and principal
Financing activities		Principal	Principal	
Other main dif	ferences			
Sale and leaseback transactions		Partial gain or loss recognition	Full gain or loss recognition	
Subleases—classification by an intermediate lessor as either operating 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.

³Applying 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

नुग्ने ifrs.org

 \mathbb{X} @IFRSFoundation

▶ IFRS Foundation

ألآ International Accounting Standards Board

