

15 September 2025

Carolyn Cordery
Chair, New Zealand Accounting Standards Board
External Reporting Board
Level 6, Featherston Street
Wellington 6011

Via email submission: accounting@xrb.govt.nz

Request for Information - Post-implementation Review of IFRS 16 Leases

Dear Carolyn

As one of the largest professional accounting bodies in the world, CPA Australia represents the diverse interests of more than 175,000 members working in over 100 jurisdictions and regions around the world, working in diverse roles across public practice, commerce, industry, government and academia throughout Australia, New Zealand and internationally. We welcome the opportunity to provide feedback on the above Request for Information - Post-implementation Review of IFRS 16 Leases (the RFI). We make this submission on behalf of our members and in the public interest.

In preparing our response to these questions, CPA Australia has undertaken extensive outreach to gather feedback across a wide spectrum of stakeholders. This has included:

- Joint research with the University of Melbourne, including a benchmark analysis of a sample of Australian listed companies (**Attachment B**). Given the close alignment of NZ IFRS 16 with IFRS 16 and the similarities in reporting practices across the Australian and New Zealand capital markets, we consider that the findings from this research are relevant and provide valuable insights to the RFI.
- Engagement with members of CPA Australia including the CPA Australia Reporting and Assurance Centre of Excellence
- 3 co-hosted roundtables with the Australian Accounting Standards Board (AASB), the New Zealand External Reporting Board (XRB) and Chartered Accountants Australia and New Zealand (CA ANZ).

In addition, our analysis draws on topics and concerns identified through our previous submissions, ensuring continuity and a robust evidence base. Taken together, this approach has allowed us to capture a comprehensive set of perspectives that reflect the overall impact, practical challenges and implications of applying the NZ IFRS 16 *Leases* (equivalent to the IFRS 16 *Leases*).

CPA Australia is in the process of preparing a separate submission to the IASB in response to its request for information as part of the IFRS 16 post implementation review. Our submission to the IASB is still progressing and we have attached the draft submission to the IASB for your consideration (**Attachment C**).

We set out below our high-level comments and recommendations based on the feedback received:

- **Overall, NZ IFRS 16 is meeting its objective:** the standard is meeting its objective and providing overall improvement to the quality and comparability of financial information about leases.
- **Explore simplification and reliefs:** particularly in areas such as discount rate determination, long-term property leases and low-value leases, where costs and complexity remain disproportionate.
- **Clearer, sector-specific guidance:** with practical examples to reduce inconsistency in applying requirements on lease definition (e.g., substantial substantive rights), lease-term assessment, lease reassessment vs. modifications, lease incentives, and sale-and-leaseback transactions, as well as improving disclosure practices (e.g. cash flow classification) to better reflect how users assess lease information.

Attachment A sets out CPA Australia’s detailed responses to the questions in [RFI](#). We have also included CPA Australia Research Report 1 (**Attachment B**) and a draft submission to the IASB’s IFRS16 PIR (**Attachment C**) to support the comments provided in this submission. Should you have any questions or wish to discuss further, please contact Ram Subramanian, Financial Reporting Lead at ram.subramanian@cpaaustralia.com.au.

Yours sincerely

Elinor Kasapidis
Chief of Policy, Standards and External Affairs
CPA Australia

Attachment A: CPA Australia's Response

1. Cost-benefit of ongoing compliance

1.1 Feedback requested from Preparers

We seek feedback on whether ongoing NZ IFRS 16 compliance costs remain significant for preparers, what the main sources of these costs are, and whether they are proportionate to the benefits.

Feedback received through our co-hosted roundtables with the AASB, XRB and CA ANZ, together with commissioned research conducted with the University of Melbourne, suggests that the standard is generally operating as intended for larger organisations. However, ongoing compliance costs remain a concern for some preparers, particularly smaller entities. This concern arises primarily with Australian non-listed entities complying with the standard's full recognition and measurement requirements, and smaller Australian listed entities.

Our research into Australian listed entities (**Attachment B**) provides useful insights given the close alignment of NZ IFRS 16 with IFRS 16 and the similarities in reporting practices across Australian and New Zealand capital markets. Data from the research shows that the number of listed entities recognising lease liabilities has increased significantly since adoption of the standard and has remained consistently high between 2021 and 2024. Leases were identified as a Key Audit Matter (KAM) in only 4% of audit reports across Australian listed companies, concentrated in consumer sectors with high exposure to retail premises. This indicates that IFRS 16 does not create significant challenges from an audit perspective, and its requirements can generally be absorbed within existing reporting processes.

However, stakeholder feedback from outreach activities highlights some concerns areas for improvement:

- **Contradictions in requirements:** Some requirements (e.g. discount rates) demand precise calculations while others (e.g. portfolio application) allow broad judgment, contributing to higher ongoing costs without clear benefit.
- **Higher relative cost on smaller listed entities:** Larger organisations are generally able to absorb the requirements with access to better systems and resources, while smaller entities face disproportionately high costs. Lease calculations relating to remeasurement are not as reliable with less sophisticated software solutions, forcing more manual intervention, and compliance costs represent a significant proportion of resources relative to firm size.
- **Complexity versus substance:** Some stakeholders have expressed a view that IFRS 16 transforms what are, in practice, straightforward rent payments into a complex series of accounting entries (right-of-use assets, liabilities, interest expenses, and amortisation costs). They view this as detached from the commercial substance of leases, particularly for smaller entities. Moreover, banks and internal management often reverse or ignore the adjustments, focusing instead on cash flows. This raises some concern that the ongoing costs of complying with IFRS 16 are higher than anticipated, with some estimating compliance with IFRS 16 drives around 20% of audit fees.
- **Lack of a clear benchmark for costs:** Stakeholders noted that while most preparers agree compliance costs are higher than anticipated, it is difficult to assess whether these costs are truly "excessive" in the absence of a clear benchmark of what ongoing costs were expected to be. This lack of a reference point makes evaluation inconsistent and subjective.

In summary, while IFRS 16 has not led to unexpected burdens from an audit perspective, preparer feedback underscores concern around the uneven distribution of costs, the limited relevance of some information for users, and the lack of benchmarks for assessing proportionality. We encourage the XRB and IASB to consider whether additional simplifications or reliefs are warranted for smaller entities, whether requirements could be better aligned with the economic substance of leases, and whether clearer expectations around ongoing costs should be developed to support future evaluations.

1.2 Feedback requested from Users

We are interested in how NZ IFRS 16 information is used to assess financial position and performance, and its value for analysis and decision-making.

Overall, we consider that the usefulness of information arising from NZ IFRS 16 is broadly consistent with expectations, in that it has improved transparency and provided users with a clearer picture of lease-related obligations. Our outreach through the co-

hosted roundtables revealed that the perceived usefulness of lease information varies significantly between different categories of users:

- **Divergent stakeholder perspectives:** Some preparers and auditors view the information as burdensome or less relevant to decision-making, whereas others—such as credit rating agencies—value it highly, as it aligns with their long-standing practice of capitalising lease commitments. This suggests that usefulness depends on the stakeholder’s perspective and objectives.
- **Banks and internal management:** Some banks and internal management teams routinely exclude IFRS 16 information, focusing instead on cash flows and future lease commitments (for further details please see Question 4.2 below). This practice indicates that for certain key users, the usefulness of IFRS 16 arising from information may not be as high as expected.
- **Analysts and transaction-focused users:** Feedback also indicated that analysts often find the information more difficult to reconcile for comparability and valuation purposes, particularly in merger and acquisition scenarios. This adds complexity to their work and may reduce the perceived usefulness of the information.

2. Discount rates – use of interest rates implicit in the lease (IRIL) and incremental borrowing rates (IBR)

2.1 Feedback requested from Preparers

Most entities use IBR rather than IRIL for discount rates. We want to know the reasons for this, any challenges in determining discount rates, and details of the methodologies used.

2.2 Feedback requested from Users

We seek views on the usefulness of specific, quantified discount rates and clear explanations of how rates are determined for comparing lease obligations.

In responding to Question 2.1 and 2.2, feedback from our co-hosted roundtables indicates that discount rate determination continues to be a judgement-intensive and challenging areas of applying IFRS 16.

In practice, entities overwhelmingly default to using the IBR as the interest rate implicit in the lease is rarely observable, particularly for property leases. Determining the IBR requires assumptions about credit risk, lease term, and prevailing financing conditions, which introduces significant subjectivity and variation in application. Stakeholders consistently reported that methodologies differ across entities, often reflecting internal policies rather than consistent market benchmarks. While some suggested that portfolio-based approaches (e.g., applying standardised rates for common lease tenors) could improve comparability, most systems are not designed to operationalise this efficiently, resulting in manual workarounds and further inconsistency. Further details on comparability challenges arise from system limitations can be referred to Question 4.1 below

From a preparer perspective, this reliance on the IBR creates additional compliance costs and complexity. For smaller entities in particular, the need to estimate and document discount rate methodologies places a disproportionate burden (as explained in Question 1.1 above).

From a user perspective, views on the usefulness of discount rate disclosures are mixed. Some investors and credit rating agencies value transparency around quantified rates and methodologies, as this assists in understanding assumptions underlying lease liabilities. However, banks and internal management teams generally prioritise cash flow commitments and often disregard IFRS 16 adjustments, limiting the perceived relevance of detailed discount rate disclosures. Analysts also noted that variation in methodologies reduces comparability across entities, making it harder to incorporate lease obligations consistently into valuation or transaction models.

As such we suggest that the XRB and IASB explore whether further guidance or simplifications, such as clearer parameters for applying portfolio-based rates or sector benchmarks, could reduce cost and improve comparability, without undermining the principle of faithful representation.

3. Long-term property leases

3.1 Feedback requested from Preparers

Long-term leases are common in NZ. We want to understand the practical, measurement, and judgement challenges in managing and accounting for these leases, and whether current requirements are fit for purpose.

For long-term leases, we consider the requirements around lease-term assessment, lease modifications, and sale-and-leaseback transactions to be complex and judgement-intensive for NZ IFRS 16.

Lease term assessment: Stakeholders highlighted that determining lease term remains a highly judgemental and resource-intensive exercise. In particular, the assessment of whether extensions are “reasonably certain” varies significantly across entities. For long property leases, such differences can materially affect reported assets, liabilities, and performance ratios (e.g., return on assets), undermining comparability. Retail and infrastructure leases were cited as areas where interpretation varies most widely. Feedback strongly supports the need for more integrated and practical guidance, with sector-relevant examples for land and building leases.

Lease modifications: Preparers frequently confuse lease modifications with remeasurements, especially for CPI-driven rent resets or umbrella agreements spanning multiple assets. Some preparers incorrectly update discount rates for remeasurement events, adding unnecessary ongoing cost and inconsistency. From an auditing perspective, distinguishing modifications from remeasurements is a recurring source of difficulty and can lead to disagreements between preparers and auditors.

Sale-and-leaseback transactions: Although limited feedback was received on this matter, preparers observed that sale-and-leaseback transactions involving property are one of the more complex areas. The main challenge lies in assessing whether the transfer constitutes a “true sale.” With IFRS 16 relying heavily on the transfer-of-control framework in IFRS 15, entities face uncertainty, particularly where only part of a building or infrastructure asset is transferred. These difficulties have given rise to diversity in practice, with some entities recognising sales and others treating them as failed sales, leading to inconsistent recognition of gains, losses, and lease liabilities. This divergence reduces comparability and the usefulness of reported information.

Stakeholders recommended clearer, dedicated guidance in IFRS 16 for sale-and-leaseback arrangements, including:

- Clarifying the criteria for assessing whether a transfer is a true sale or a failed sale, possibly by embedding principles similar to those used in IFRS 3 for valuing asset acquisitions as part of business combinations, which separate different transaction components.
- Providing guidance on how to treat subsequent events or modifications — i.e., whether and when reassessment or modification is required.
- Addressing conceptual inconsistencies between IFRS 15, IFRS 9 and IFRS 16, so preparers are not left unclear on which path to follow for specific fact patterns.
- Developing and providing further illustrative examples, including for partial asset transfers and hybrid arrangements (e.g., one floor of a building), to improve comparability in practice.

3.2 Feedback requested from Users

We are interested in what information about long-term leases is most useful for understanding financial position, risk, or future cash flows.

No further comment.

4. Disclosure practices and comparability

4.1 Feedback requested from Preparers

There is variation in the level of detail provided in lease disclosures. We seek reasons for this variation (e.g., materiality, system limitations), challenges in preparing disclosures, and whether it affects comparability and transparency.

As noted in our cover letter and in our above response to Question 3.1, there are inconsistencies in how the accounting requirements are applied by preparers (e.g., lease definition, lease-term assessment, lease reassessment vs. modification, sale-and-leaseback etc.). These inconsistencies in how the accounting requirements are applied may also lead to inconsistencies in the related note disclosures.

We also received feedback that many lease accounting systems are not fully capable of handling complex arrangements such as lease modifications, variable lease payments, subleases, and sale-and-leasebacks. As a result, preparers often resort to manual adjustments outside the system, which increases the risk of inconsistency and error. Differences in system design, where some focus on asset management of lease contracts and others on accounting calculations, also lead to divergent outcomes in disclosure quality and level of detail.

4.2 Feedback requested from Users

We want to know which lease disclosures are most useful, and if any areas are inadequate or need improvement.

Overall, stakeholders acknowledged that NZ IFRS 16 has improved transparency and comparability of lease-related disclosures. However, feedback from our co-hosted roundtables indicates that the usefulness of these disclosures varies significantly across different user groups. While some users find the information helpful, others either adjust or disregard it, limiting its practical value for decision-making. This suggests that, although statutory reporting has improved, further clarity and consistency in certain areas (such as cash flows disclosures) would enhance decision-usefulness.

Relevance for key stakeholders: Some banks and analysts indicated that they routinely exclude lease-related information when monitoring debt covenant compliance or assessing performance. Instead, they place greater weight on disclosures of future lease commitments and cash flow information. Similarly, many preparers reverse lease-related information in external market communications, e.g. presenting EBITDA and cash flows on a pre-IFRS 16 basis, to maintain consistency with peers, competitors, and US GAAP reporters. This suggests that, while statutory comparability has improved, decision-usefulness for certain stakeholders is reduced, as leases continue to be viewed in practice as an operating expense rather than a financing activity.

Cash flow disclosures: Users noted that overall, IFRS 16 has enhanced visibility of lease-related cash flows. However, concerns were raised about inconsistency in classification within the cash flow statement, particularly in separating operating and financing cash flows. Some stakeholders observed that the distinction between assets acquired through debt financing (legacy finance leases) and assets rented for operational purposes (legacy operating leases) has become blurred. From a user's perspective, this treatment adds complexity to what is often viewed commercially as a straightforward rental cost.

Our comments based on divergent stakeholder perspectives can also be referred to in our response to Question 1.2.

5. User adjustments to reported figures

5.1 Feedback requested from Preparers

We seek preparer views on what lease information users (including banks and lenders) request, whether users ask for information beyond NZ IFRS 16 disclosures, and if different or additional information is needed to meet user needs.

Please refer to our responses to Questions 1.2 & 4.2.

5.2 Feedback requested from Users

We want to understand why users adjust for NZ IFRS 16, what information is lacking, and how presentation or disclosure could be improved.

Apart from our comments noted in our responses to Questions 1.2, 4.2 and 5.1, our commissioned research (**Attachment B**) shows variability in how lease liabilities are treated in performance metrics. Among the largest lease-intensive firms, most include lease liabilities in Return on Invested Capital (ROIC) calculations, while a notable minority exclude them. Inconsistencies in how lease-related information is included in management performance measures could create a risk of divergent or potentially misleading performance measures, particularly when IFRS 16-based figures are presented alongside non-IFRS or "management" performance measures. These risks are likely to increase with the introduction of IFRS 18 on Presentation and Disclosure in Financial Statements, which places greater emphasis on transparent reporting of management-defined performance measures.

CPA Australia Leases Research Report 1

IFRS 16 *Leases*: A review of
implementation and
effectiveness

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Executive summary

This report provides an overview of the impact of adopting IFRS 16 Leases (IFRS 16) in Australia. The Australian version of IFRS 16 is AASB 16 Leases (AASB 16). The objective of this report is to assess whether IFRS 16 is achieving its intended goals, when applied by Australian listed companies. The report focusses on three key areas of IFRS 16 implementation in Australia:

- a. Lease recognition: The frequency and magnitude of lease liability recognition following the adoption of IFRS 16;
- b. Key Audit Matters: The frequency and nature of lease-related Key Audit Matters (KAMs) disclosed in 2024 audit reports; and
- c. Management commentary: Whether firms include lease liabilities in the denominator (invested capital) when voluntarily reporting Return on Invested Capital (ROIC) in the management commentary section of annual reports.

Lease recognition

The data show a sharp increase in recognition, with the proportion of firms reporting lease liabilities, rising from 42% prior to IFRS 16 to approximately 90% post-adoption. This widespread recognition and economic materiality suggest that preparers have engaged with and operationalised the principles of IFRS 16. Moreover, the results indicate continued high level of compliance with the standard between 2021 and 2024, providing strong evidence that the standard's ongoing implementation costs are sustainable and in line with expectations.

Key audit matters

In relation to KAMs, leases were identified as a KAM in only four per cent of audit reports across the sample. The small proportion suggests that lease accounting under IFRS 16 is not a significant source of audit complexity or cost.

Management commentary

Finally, in relation to the reporting of ROIC, among the ten largest lease-intensive firms in Australia, 70% included lease liabilities in the ROIC denominator, consistent with the intention of IFRS 16 that leases are a source of funding and financial capital. This signals that many firms consider lease liabilities to be relevant and decision-useful for assessing financial performance, aligning with the objectives of IFRS 16. However, a notable minority (30%) excluded lease liabilities from the ROIC calculation. This practice has the potential to be misleading in relation to performance metrics.

Conclusion

Overall, the evidence presented in this report supports the conclusion that IFRS 16 is achieving its intended objectives. The only area highlighted where further refinement is warranted relates to the treatment of lease liabilities in voluntary performance metrics such as ROIC. Given that ROIC is a key performance indicator used widely by analysts and investors, we recommend that the IASB address this issue through further guidance or educational material in relation to management commentary, or in IFRS 18 and related standards.

Addressing this issue would help ensure that the benefits of IFRS 16 in the primary financial statements are not undermined by selective reporting practices in management commentary.

Background

There are two primary reasons for the University of Melbourne to undertake this current research project with the support of CPA Australia. Firstly, the research seeks to update previous research undertaken to understand impacts of the standard when it was issued. This initial research culminated in two research reports:

- [Implementing AASB 16 Leases: are preparers ready?](#)
- [AASB 16 Leases: investor perspectives](#)

Secondly, the current research project seeks to gather and present suitable empirical evidence to assist with the post implementation review of IFRS/AASB 16 being undertaken by the IASB/AASB.

This research report sets out findings from a benchmark analysis of listed companies that explores some potential disclosure impacts arising from the standard as described above. In addition to the findings from the benchmark analysis showcased in this report, the research project will also be informed by a series of roundtables to be conducted with various sector-based stakeholders to obtain further evidence of the impacts of the standard and opportunities for improvement. The aim of the research project is to make available further information to the standard-setters and other stakeholders as it becomes available, with a further report to be published in the first half of 2026.

Introduction

The adoption of IFRS 16 *Leases* (IFRS 16) marked a pivotal shift in lease accounting, with the central aim of bringing greater transparency and comparability to financial statements by requiring lessees to recognise almost all leases on the balance sheet. The current International Accounting Standards Board (IASB) post-implementation review (PIR) evaluates the extent to which the standard is meeting these objectives, particularly in relation to its core principles, the informational value it provides to users of financial statements, and the costs incurred in its application, audit, and enforcement.

This report draws on data from Australian listed entities following mandatory adoption of IFRS 16 (AASB 16) and analyses the following focus areas:

- Lease recognition: The frequency and magnitude of lease liability recognition following the adoption of IFRS 16;
- Key Audit Matters: The frequency and nature of lease-related Key Audit Matters (KAMs) disclosed in 2024 audit reports; and
- Management commentary: Whether firms include lease liabilities in the denominator (invested capital) when voluntarily reporting Return on Invested Capital (ROIC) in the management commentary section of annual reports.

In analysing these areas, we aim to address the following three components of Question 1 in the IASB's Request for Information:

1. Whether the core principles of IFRS 16 are clear and are being met in practice;
- d. Whether the information provided about leases meets the needs of users; and
- e. Whether the costs of applying, auditing, and enforcing the standard are as expected.

These and other findings are expanded on in the remainder of this report which is structured as follows. Section 1 documents the frequency and magnitude of lease liability recognition under IFRS 16 for Australian listed companies. Section 2 documents the frequency and nature of the designation of leases

as a Key Audit Matter in the audit reports of Australian listed companies in 2024. Section 3 examines if management, for the purpose of reporting ROIC in the management commentary section of the annual report, include lease liabilities in the calculation of invested capital (i.e., the denominator of ROIC).

Section 1: Frequency and magnitude of lease liability recognition

The core principle of IFRS 16 is that lessees should recognise assets and liabilities arising from leases unless the lease is of low value or short-term. This approach represented a shift from the previous distinction between operating and finance leases under IAS 17 *Leases* (IAS 17), which allowed many lease obligations to remain off-balance sheet. IAS 17 drew a distinction between finance and operating leases, and only required recognition of assets and liabilities arising from finance leases.

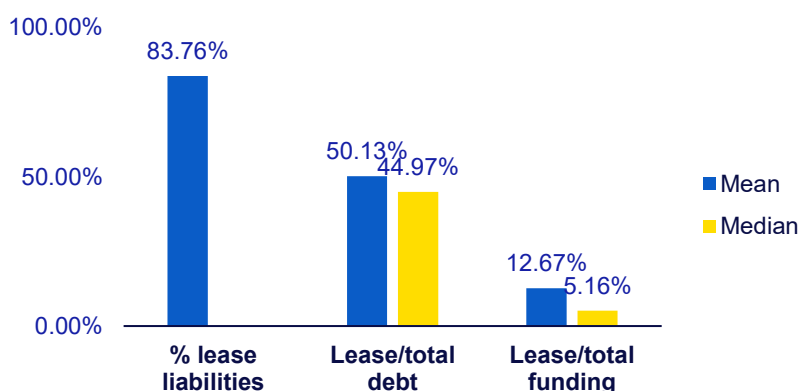
To address whether the core principles of IFRS 16 are clear and are being met in practice we analysed the frequency and magnitude of lease liability recognition under IFRS 16 across the period from the year of adoption in 2020 to 2024 for a sample of Australian firms¹ across the following:

- the frequency² and magnitude of lease liabilities recognised under IFRS 16 in 2024; and
- f. yearly time-series of the frequency and magnitude of lease liabilities since the adoption of IFRS 16 in 2020.

Frequency and magnitude of leases liabilities – 2024 results

The following charts present the summary statistics for the sample as at 2024. The data these charts are based on are derived from Table 1 included in Appendix A to this report.

Chart 1 - Frequency and magnitude of lease liabilities recognised by Australia listed companies - full sample



¹ See Appendix D for the sample construction.

² The frequency of recognition is simply measured as the number of firms that have recognised a lease liability as a percentage of the total sample of firms. The two metrics we use to assess magnitude are: (1) the value of lease liabilities as a percentage of total debt. Where total debt is the sum of borrowings and lease liabilities. The descriptive statistics for this metric are based on the sample of firms that have debt > 0 and thus is bounded between 0 and 100%, and (2) the value of lease liabilities as percentage of total funding where total funding is total debt plus total shareholder equity.

Chart 2 - Frequency and magnitude of lease liabilities recognised by Australia listed companies - by entity size³

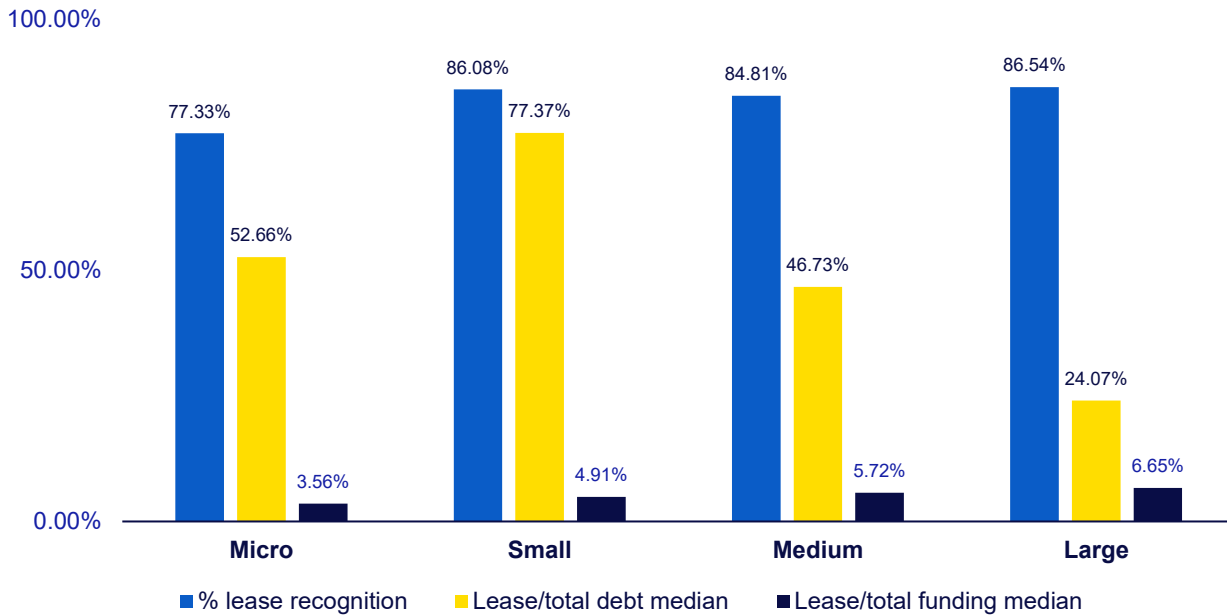
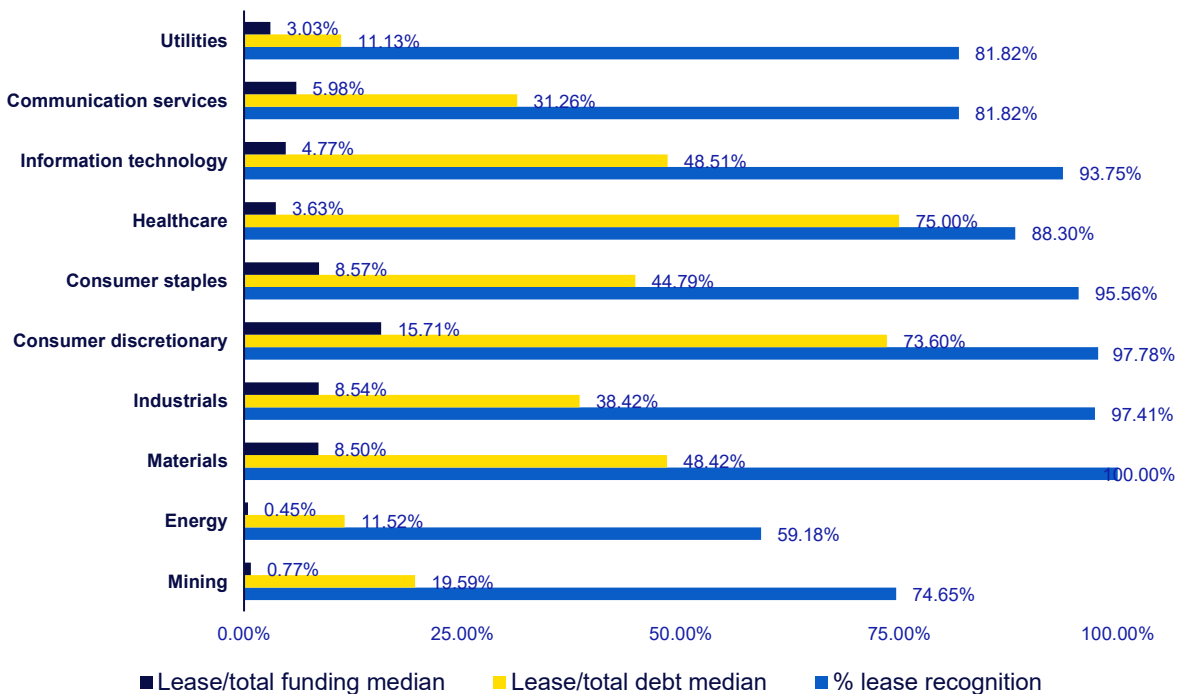


Chart 3 - frequency and magnitude of lease liabilities recognised by Australia listed companies - by sector



³ Firm size categories, based on total assets, are defined as follows: Micro – less than \$23 million; Small – \$23 million to less than \$102 million; Medium – \$102 million to less than \$593 million; Large – greater than \$593 million.

Our findings strongly suggest that the core principle of IFRS 16, capitalisation of leases, is both widely understood and implemented in practice. By 2024, 84% of firms in our sample recognised lease liabilities (Chart 1 above). Importantly, lease recognition rates were consistent across firm size categories. Even among micro-cap firms, 77% recognised lease liabilities in 2024, and among small to large entities, this figure was 86% (Chart 2 above). All sectors have a high level of lease recognition with the lowest being in the mining (75%) and energy sectors (60%)⁴ (Chart 3 above). This widespread application indicates that the principle of capitalisation is understood and applied not only by large entities with sophisticated accounting functions, but also by smaller entities where accounting resources may be more limited.

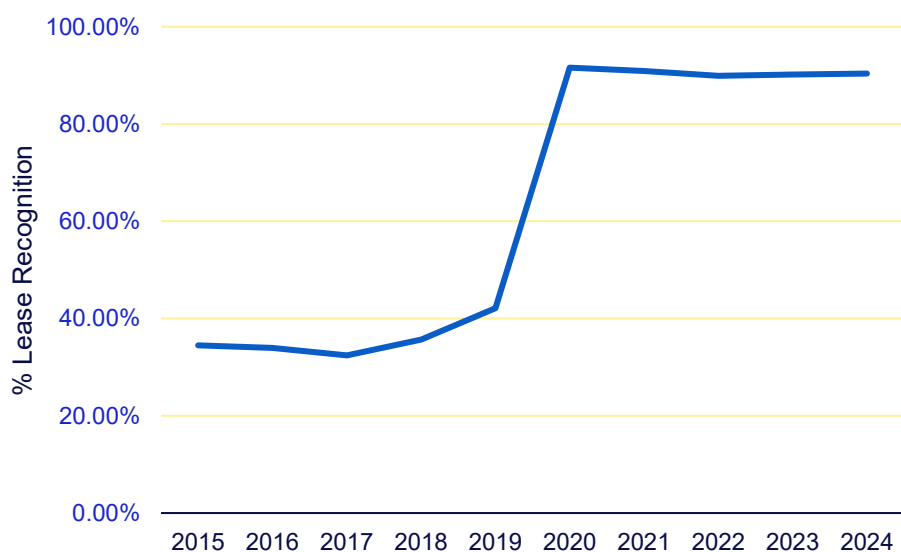
Moreover, the reported lease liabilities were economically material, as demonstrated by the magnitude of lease liabilities as a percentage of total debt for the median firm being 45%⁵ (Chart 1 above).

Taken together, these findings support the conclusion that the core principle of lease capitalisation is not only clear but also being broadly applied consistently in practice. IFRS 16 is achieving its objective of bringing leases onto the balance sheet and improving the quality of financial statements.

Changes across time in the frequency and magnitude of lease liabilities

To provide insight into the impact of IFRS 16, we also undertook a time-series analysis of lease liabilities from 2016 to 2024.⁶ The results are presented in Table 2 (see Appendix A), and graphically in Figures 1 and 2 below.

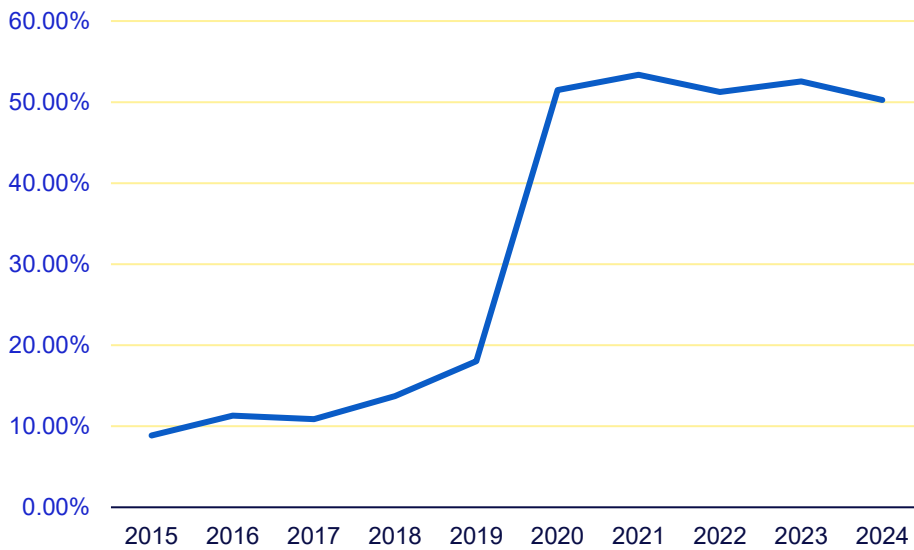
Figure 1 – % Lease Liability Recognition



⁴ The sector with the greatest level of lease liabilities is the retail sector, where, in Australia, prime locations in shopping centres are typically held by property investors and must be leased rather than purchased.

⁵ The *variation* in the magnitude of leases as a % of debt financing is substantial. As reported in Table 1 panel A the 25th (75th percentile) is 14% (97%). This implies that for 25% of firms, leases are the primary or only source of debt financing (>97% of debt financing is from leases) and for another 25% of firms' leases are a very low source of debt financing (<14% of debt financing is from leases).

⁶ The analysis is restricted to firms that existed in all years of the sample period. This restriction ensures that observed changes are attributable to the adoption and application of IFRS 16, rather than to firms entering or leaving the listed population due to new listings or delistings. The data are reported by calendar year, based on the financial year-end of each firm. IFRS 16 became mandatory for financial years beginning on or after 1 January 2019. As a result, the calendar year 2020, which includes both 30 June and 31 December year-ends, represents the first full year of adoption for most Australian firms.

Figure 2 – Lease Liability/Total debt

A clear pattern emerges when comparing the year of adoption, 2020, to the preceding year, 2019. The proportion of firms recognising lease liabilities increased significantly from 42% in 2019 to 92% in 2020. In addition to this increase in frequency, there was a material change in the magnitude of reported lease obligations. The average ratio of lease liabilities to total debt rose from 18% in 2019 to 51% in 2020. This shift demonstrates that for the average firm, the capitalisation of leases had a substantial effect on reported leverage. These findings suggest that IFRS 16 impacted a broad cross-section of firms and materially changed the presentation of financial obligations. As such, they provide support for the view that the standard improves both the transparency and comparability of financial information.

Looking at the years following initial adoption, from 2021 through 2024, the percentage of firms recognising lease liabilities remained stable. Similarly, the average ratio of lease liabilities to total debt did not exhibit any material decline. This ongoing consistency suggests that firms have continued to comply with the requirements of IFRS 16 without withdrawing from recognition over time. The absence of any reduction in recognition implies that the costs of applying and complying with IFRS 16 have not deterred firms from ongoing compliance with the Standard nor led firms to alter financing arrangements significantly.

Implications for standard-setting

These findings provide evidence that the ongoing costs of applying IFRS 16 are reasonable and appropriate; broadly consistent with the IASB's expectations. Two factors support this interpretation:

- First, compliance with IFRS 16 does not appear to deter the use of leases by either micro firms or firms for which lease liabilities represent only a small proportion of total debt. This suggests that even firms with limited resources or minimal lease exposure are able to comply with the standard without undue cost or burden.
- Second, the near-universal recognition of lease liabilities implies the presence of substantial scale economies. The widespread use of leases across firms likely facilitates the sharing or adoption of common systems, software, and accounting processes for lease recognition, thereby reducing the per-unit cost of compliance, particularly for property and buildings leases.

In addition, the consistently high level of lease liability recognition, along with the economically significant magnitude of lease liabilities for the typical firm, provides evidence that the information produced under IFRS 16 is materially relevant. This supports the view that the standard meets its objective of improving

the faithful representation of financial position and performance by bringing lease obligations onto the balance sheet.

Finally, the significant variation in the extent to which firms use leases as a source of debt financing indicates that IFRS 16 contributes meaningfully to improving the comparability of financial information. By requiring the recognition of lease liabilities, IFRS 16 enables users to better assess and compare the total level of financial leverage and associated risk across different firms and industries.

Section 2: The frequency and nature of lease-related Key Audit Matters

The shift to on-balance sheet lease accounting was expected to improve the ability of users, especially investors, analysts, and creditors, to assess leverage, capital efficiency, and cash flow commitments. In this section of the report, we examine the frequency and nature of the designation of leases as a Key Audit Matter (KAM) in the audit reports of Australian listed companies.⁷

Audit reports offer a unique lens through which to observe the relative complexity and judgement involved in applying IFRS 16. Auditor's reports of listed entities in Australia are required to provide information about key audit matters (KAM). KAM are "those matters that, in the auditor's professional judgement, were of most significance in the audit of the financial statements of the current period".⁸ The audit report is required to include a description of each key audit matter that addresses why the matter was considered to be one of most significance in the audit and therefore determined to be a key audit matter. This is the "Why Significant" section of the audit report.⁹

As KAMs are relative, if the costs and complexities of accounting for and auditing leases are larger than expected we should find an abnormal frequency of leases identified as a KAM. Furthermore, if the costs are larger than expected, the designated reasons for the KAM in the "Why Significant" section of the audit report should be for underlying reasons of judgment and uncertainty that were not expected.

Out of the full sample, only 4% of firms (17 companies) had an audit report in which leases were identified as a KAM subject matter. These firms are listed in Table 3 included in Appendix A. Across all firms, there were 955 individual KAMs reported in total; of these, only 17, or 2%, had leases as the subject matter. This makes lease-related KAMs relatively rare. The full list of KAM subject matters and their frequency is reported in Table 3 in Appendix A.

The results also showed a concentration for KAMs in certain sectors. Fifteen of the 17 firms with lease-related KAMs were in the consumer staples or consumer discretionary sectors. This may reflect the

⁷ We sampled the full population of Australian listed entities (excluding mining, real estate and banking firms) with reporting periods ending in 2024. We categorised and classified the KAMs into subject matters based on the primary financial statement account that it related to (e.g., revenue, inventory, provisions, intangibles, leases). The details of the sample selection and methodology for classification of the KAMs is discussed in Appendix E. Overall, we have a final sample of 529 firms. We have classified 29 distinct KAM subject matters. As each audit report may have more than one KAM we have a total of 955 KAMs.

⁸ ASA 701.8 *Communicating Key Audit Matters in the Independent Auditor's Report*. For audits of financial statements for periods ending on or after 15 December 2016, auditor's reports of all listed entities in Australia have been required to provide information about key audit matters.

⁹ ASA 701.13. A full extract of an audit report with a lease as KAM is provided for illustrative purposes in Appendix B.

higher prevalence of leased assets in retail and franchise-heavy industries, where physical premises and equipment are commonly leased.

Taken together, these findings suggest that leases are not frequently regarded as a high-risk area requiring special audit focus. As such, there is no evidence from audit frequency that the cost and complexity of auditing lease-related disclosures under IFRS 16 has been greater than expected.

Additional analysis

To explore the audit rationale for identifying leases as a KAM, we reviewed the “Why Significant” sections of the audit reports for all 17 firms. (See extracts in Appendix C). The rationale provided by auditors typically centred on two factors: the economic significance of lease liabilities, both in volume and value, and the requirement for management to make key judgments and estimates. Among the 17 firms, the most commonly cited area of audit judgment was the determination of the incremental borrowing rate used to discount future lease payments. Other areas, though less frequently mentioned, included the accounting treatment of backdated rent variations, the assessment of renewal options contained within leases, and the handling of sub-lease arrangements, particularly in franchise models.

Overall, the review of audit report disclosures did not identify any unexpected sources of estimation uncertainty or judgment that would suggest IFRS 16 presents unforeseen challenges in practice. The findings provide further support for the conclusion that the auditing of IFRS 16 lease obligations is operating as intended and without undue burden.

Section 3: Computation of ROIC reported in management commentary

This section examines how companies treat lease liabilities when calculating Return on Invested Capital (ROIC) in the management commentary section of their annual reports. ROIC is widely regarded as a key performance measure for assessing the efficiency of capital use and value creation. The analysis focuses on whether lease liabilities recognised under IFRS 16 are incorporated into the denominator of ROIC, which reflects the total invested capital.

ROIC is a voluntary reported metric and, therefore, reflects the demand and needs of users. ROIC as following examples illustrate, is the most widely used metric to measure performance and productivity and thus the amount of value a company creates.¹⁰

“Underlying return on capital employed is an indicator of the Group’s capital efficiency” (BHP, 2024, p18.)

“ROC has been adopted as the principal measure of performance for the divisions. ROC focuses the divisions on increasing earnings and/or increasing capital productivity by managing existing assets efficiently” (Wesfarmers 2024 Annual Report, p.16)

¹⁰ At a conceptual level the definition of ROIC is:

$$ROIC = \frac{\text{Profit}}{\text{Invested Capital}}$$

“Underlying ROCE measures how efficiently we generate profits from investment in our portfolio of assets” (RIO Tinto, 2024, p.12)

We examine if firms include or exclude lease liabilities in their definition of Debt for purposes of computing *Invested Capital* and *ROIC*. It is expected that lease liabilities would be included in the calculation as the objective of ROIC is to measure the returns on all capital invested in the business.

As outlined in the below Table4, the findings indicate that a significant majority, 70% of the sampled companies, include lease liabilities in the denominator of ROIC. This finding suggests that most firms consider lease liabilities to represent a meaningful component of financial capital. Their inclusion in invested capital supports a more accurate and reliable assessment of financial performance and capital efficiency, in line with the broader objectives of IFRS 16.

Table 4 – Australian companies examined to determine if leases included in computation of ROIC¹¹

Company	Total Assets (\$m)	Leases Liabilities (\$m)	Lease liabilities / Total Funds	Lease included in ROIC?
Woolworths Group Limited	33,936	12,144	54.48%	Yes
Coles Group Limited	19,870	8,417	61.50%	Yes
Wesfarmers Limited	27,309	6,522	32.83%	No
Ramsay Health Care Limited	20,894	5,854	35.55%	No
Endeavour Group Limited	11,783	3,913	39.76%	Yes
BHP Group Limited*	102,362	3,116	4.46%	Yes
TPG Telecom Limited	19,094	2,205	12.62%	Yes
Woodside Energy Group Ltd	61,264	1,623	3.40%	Yes
Qantas Airways Limited	20,564	1,556	22.60%	Yes
Sonic Healthcare Limited	14,826	1,527	12.13%	No

*Numbers quoted are in US Dollars

However, a notable minority, 30% of the sample, exclude lease liabilities from their ROIC calculations. This practice raises concerns regarding the comparability and reliability of ROIC as a performance metric across firms. When lease liabilities are excluded, ROIC figures may be overstated, potentially presenting a distorted view of how efficiently a company uses its capital.

This inconsistency suggests that, while IFRS 16 has significantly improved the quality of financial statements, the effectiveness of lease information in management commentary and voluntary

¹¹ The information in Table 4 has been extracted from the publicly available 2024 Annual Reports

performance metrics remains uneven. The divergence points to a possible gap in guidance under IFRS 18 and IFRS Practice Statement 1. In particular, paragraph 121 of IFRS 18 requires management performance measures to faithfully represent financial performance, which may not be achieved when lease liabilities are selectively excluded from capital-based metrics.

To address this issue, we suggest that the IASB explore available educational avenues, such as through IFRS Practice Statement 1 *Management Commentary* (revised), or other educational material to provide clearer guidance on the appropriate treatment of lease liabilities in performance metrics disclosed in management commentary.

The issue is not limited to the consideration of IFRS 16, however. It also intersects directly with the reporting of management-defined performance measures and disclosures related to capital, as outlined in IFRS 18 *Presentation and Disclosure in Financial Statements* which becomes effective in Australia for annual reporting periods beginning on or after 1 January 2027.¹² Arguably, the exclusion of lease liabilities from invested capital in ROIC calculations may conflict with the objectives of IFRS 18. Specifically, such reporting may not provide users with an unbiased, representative, and faithfully presented view of a firm's financial performance.

Given the significance of ROIC to financial analysis and investor decision-making, we recommend that the IASB consider this issue as part of the post-implementation review of IFRS 18, if not addressed earlier.

We conclude that IFRS 16 is fulfilling its intended objective of improving information quality in the primary financial statements. Nonetheless, there is room for improvement in ensuring that this enhanced transparency is carried through to performance reporting in management commentary.

Conclusions and policy recommendations

The evidence presented in this report supports the conclusion that IFRS 16 has largely achieved its objectives. The requirement to recognise leases on the balance sheet has led to greater transparency and comparability in financial statements and has proven to be well-understood and applicable across a diverse range of entities. Auditors and preparers appear to be managing the judgements and estimates inherent in the standard without undue difficulty.

At the same time, our findings point to opportunities for improvement, particularly in the alignment of voluntary performance metrics with the principles of IFRS 16. Inconsistencies in the treatment of lease liabilities in metrics such as ROIC, despite their materiality, may undermine the comparability and reliability of management commentary. This is an area where further guidance or educational material in relation to management commentary, or in IFRS 18 and related standards would be beneficial.

Overall, we recommend that the IASB maintain the current scope and core principles of IFRS 16, which are being effectively applied in practice and provide additional guidance or examples to encourage the faithful representation of leases in management-defined metrics.

These measures would help ensure the full benefits of IFRS 16, going beyond the balance sheet to improve transparency, consistency and usefulness of financial reporting.

¹² See paragraphs 117–123 and 126–129.

Appendix A

TABLE SUMMARY

Table 1 – Frequency and magnitude of lease liabilities recognised by Australian Listed Companies in 2024

Panel A Full Sample

	Observations	P25	Mean	Median	P75
% Lease Liabilities	622		83.76%		
Lease/ Total Debt	562	13.51%	50.13%	44.97%	96.66%
Lease/ Total Funding	622	1.06%	12.67%	5.16%	14.94%

Panel B By Firm size

Size Category	Observations	Lease Recognition (%)	Lease/ Total Debt			Lease/ Total Funding		
			P25	Median	P75	P25	Median	P75
Micro	150	77.33%	11.70%	52.66%	100.00%	0.26%	3.56%	12.85%
Small	158	86.08%	19.58%	77.37%	100.00%	1.01%	4.91%	16.93%
Medium	158	84.81%	17.37%	46.73%	97.14%	1.25%	5.72%	14.77%
Large	156	86.54%	10.46%	24.07%	53.10%	2.14%	6.65%	15.55%

Panel C By Sector

GICS Sector	Lease Recognition (%)	Lease/ Total Debt			Lease/ Total Funding		
		P25	Median	P75	P25	Median	P75
Mining	74.65%	3.80%	19.59%	89.78%	0.02%	0.77%	4.06%
Energy	59.18%	0.00%	11.52%	35.52%	0.00%	0.45%	2.35%
Materials	100.00%	14.75%	48.42%	73.94%	4.47%	8.50%	13.98%
Industrials	97.41%	15.43%	38.42%	84.89%	3.57%	8.54%	16.95%
Consumer Discretionary	97.78%	36.83%	73.60%	98.29%	5.88%	15.71%	39.31%
Consumer Staples	95.56%	14.59%	44.79%	72.62%	2.14%	8.57%	21.31%
Health Care	88.30%	19.31%	75.00%	100.00%	1.30%	3.63%	12.83%
Information Technology	93.75%	16.45%	48.51%	100.00%	1.93%	4.77%	10.70%
Communication Services	81.82%	12.48%	31.26%	84.36%	1.49%	5.98%	14.99%
Utilities	81.82%	0.96%	11.13%	62.10%	0.36%	3.03%	8.25%
Mining	74.65%	3.80%	19.59%	89.78%	0.02%	0.77%	4.06%

%Lease Recognition is the % of the total sample of firms that recognize lease liabilities

Total Debt is Borrowings plus Lease Liabilities

Total Funding is Shareholders Equity plus Total Debt

P25 and P75 are the observations at the 25th and 75th percentile of the distribution. They imply that 25% of the sampled firms lie below (above) the 25th (75th) percentile observation respectively.

The sample is all Australian listed companies in 2024 excluding companies in the mining, finance and real-estate sectors.

Table 2 – Lease liability recognition across time

Year	Lease Recognition (%)	Lease/ Total Debt	
		Mean	Median
2015	34.52%	8.86%	0.00%
2016	33.98%	11.33%	0.00%
2017	32.42%	10.87%	0.00%
2018	35.69%	13.73%	0.00%
2019	42.09%	18.01%	0.10%
2020	91.60%	51.49%	49.87%
2021	90.89%	53.37%	50.40%
2022	89.95%	51.26%	45.72%
2023	90.21%	52.54%	46.55%
2024	90.36%	50.26%	44.88%

% Lease Recognition is the % of the total sample of firms that recognize lease liabilities
The sample is Australian listed companies that existed for the years from 2019 to 2024.

Table 3 – Frequency of KAMS by subject matter for Australian companies in 2024

KAM Subject Matter	Lease Recognition (%)	Median
Impairment	261	27.33%
Revenue	229	23.98%
Inventory	67	7.02%
Business Combinations	59	6.18%
Financial Instruments	48	5.03%
Intangibles	43	4.50%
Share Based Payment	38	3.98%
Going Concern	33	3.46%
Taxation	32	3.35%
Provisions	22	2.30%
PPE	19	1.99%
Leases	17	1.78%
Discontinued Operation	15	1.57%
Deferred Tax Asset	12	1.26%
Account Receivable	9	0.94%
Information Technology	8	0.84%
Equity Method	6	0.63%
Exploration Assets	6	0.63%
Biological Assets	5	0.52%
Contingent Liabilities	5	0.52%
Investment Property	5	0.52%
Expenses	4	0.42%
Related Party Transactions	4	0.42%
Cash	2	0.21%
R&D	2	0.21%
Grant	1	0.10%
Joint Venture	1	0.10%
Management Fee	1	0.10%
Trade Payables	1	0.10%
Total	955	100.00%

Appendix B

ILLUSTRATIVE AUDIT REPORT WHEN LEASES WERE DESIGNATED AS A KAM

Independent Auditor's Report to the members of JB Hi-Fi Limited¹³

[...]

Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial report for the current period. These matters were addressed in the context of our audit of the financial report as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

[...]

Key Audit Matter	How the scope of our audit responded to the Key Audit Matter
<p>Lease accounting</p> <p>Refer to Note 16 of Right of use assets and lease liabilities</p> <p>The Group holds right of use assets of \$568.3 million and lease liabilities of \$642.4 million. These balances are significant in the context of the Group's balance sheet as at 30 June 2024.</p> <p>In applying AASB 16 Leases, the Group is required to make a number of judgments and estimates as disclosed in Note 16, including:</p> <ul style="list-style-type: none"> Measuring the lease term (including judgements associated with lease renewal options and the accounting for leases in hold over). Determining an appropriate incremental borrowing rate to be applied in the measurement of right of use assets and lease liabilities upon initial recognition of a lease and for certain lease modifications. 	<p>Our audit procedures included the following:</p> <ul style="list-style-type: none"> Understanding the Group's processes and key controls related to the accounting for leases. Testing on a sample basis, movements in the right of use assets and lease liabilities and recalculating the interest and depreciation recognised in profit or loss. Evaluating the judgements applied by management, including the probability of exercising renewal options. Assessing the incremental borrowing rates adopted by management, by preparing an independent expectation of the incremental borrowing rates. Evaluating the adequacy of the disclosures included in Note 16 to the financial statements.

¹³ As extracted in the independent auditor's report of JB HI-FI Annual Report 2024

Appendix C

EXTRACTS FROM THE “WHY SIGNIFICANT” SECTION OF AUDIT REPORTS, WHEN LEASES WERE DESIGNATED AS A KEY AUDIT MATTER

XREALITY GROUP LIMITED

Right of use asset and lease liability

The group performed a reassessment of the calculations for the right-of-use asset and lease liabilities due to the flow on effect of higher sustained inflation and the impact on future rent increases. The right-of-use assets and lease liability calculations involves a degree of complexity and judgement around potential rent increases based on inflation. We considered in the persistent inflationary environment reviewing the right-of-use asset and lease calculations are a key audit matter due to the significant uncertainty around the current period of economic volatility. The value of the right-of use assets also forms part of our impairment assessment described above

JB HI-FI LIMITED

Lease accounting

The Group holds right of use assets of \$568.3 million and lease liabilities of \$642.4 million. These balances are significant in the context of the Group’s balance sheet as at 30 June 2024. In applying AASB 16 Leases, the Group is required to make a number of judgments and estimates as disclosed in Note 16, including:

Measuring the lease term (including judgements associated with lease renewal options and the accounting for leases in hold over).

Determining an appropriate incremental borrowing rate to be applied in the measurement of right of use assets and lease liabilities upon initial recognition of a lease and for certain lease modifications.

SILK LOGISTICS HOLDINGS LIMITED

Assessment of Lease term and incremental borrowing rate under AASB 16 Leases

As at 30 June 2024 the Group has reported right of use assets of \$283.7 million (\$142.8 million at 25 June 2023) relating to property related leases. The estimated lease term of these properties and the incremental borrowing rate forms part of the assessment for determining the right of use asset and associated lease liability at the time of initial recognition. The accounting policy and the significant estimates and judgements in relation to determining the lease term are disclosed in Notes 2 and 3. In reassessing the lease term, the Group is required to determine whether there are significant events under their control which result in renewal options being required to be incorporated into the assessment. Where lease terms have been reassessed, the Group is required to determine an appropriate incremental borrowing rate to be applied in the calculation of right of use assets and lease liabilities.

GUZMAN Y GOMEZ LIMITED

Lease

The Group has a significant lease portfolio which includes leases for restaurant sites as well as office and other leases. As set out in Notes 15, 17 & 21 to the financial statements, at 30 June 2024 the Group has recognised lease liabilities of \$239.5m, finance lease receivables of \$126.4m and right-of-use assets of \$93.8m. There were additions of \$65.5m to lease liabilities, \$24.3m to finance lease receivables and \$36.9m to right-of-use assets during the year. Included in the lease portfolio are leases which are entered into for franchise restaurants with the Group as the head lessee, and sub-leases entered into with the franchisees under the same terms as the head lease. Where the sub-lease transfers substantially all of the risks and rewards of the underlying right-of-use asset, the sub-lease is classified as a finance lease and is recognised as a finance lease receivable. Alternatively, other sub-leases are classified as operating leases and recognised as right-of-use assets. For lease additions and modifications during the year, the Group applied significant judgement in determining the incremental borrowing rate {IBR}, including the calculation method, appropriate data utilised, and the determination of the lease term with extension options.

PREMIER INVESTMENTS LIMITED

Accounting for leases

The Group holds a significant volume of leases by number and value over retail sites as a lessee. The recognition and measurement of new and remeasured lease agreements executed during the year in accordance with AASB 16 Leases ("AASB 16") are dependent on a number of key judgements and estimates. These include:

The calculation of incremental borrowing rates;

The treatment of the option to extend the lease term under holdover; and

The impact of backdated rent variations.

Accordingly, given the significant judgements and estimates involved we considered this a key audit matter.

VIVA LEISURE LIMITED

Right Of Use Assets and Lease Liabilities

At 30 June 2024, the group recognized \$255,307,160 in Right of Use Asset and \$290,225,494 in lease liabilities. The group has numerous lease arrangements in place which requires certain judgments to be made at point of recognition and measurement. We focused on this area as a key audit matter given the significance of the balance and there is risk that the leases may not be accounted for in accordance with the requirements of AASB 16 Leases.

CARLY HOLDINGS LIMITED

Lease accounting

As at 30 June 2023, the Group has recognised a current lease liability of \$346,770 and a non-current lease liability of \$640,550 in relation to an office lease and vehicle leases. We determined lease accounting to be a key audit matter as it is material, important to the users' understanding of the financial statements and involved the most audit effort and communication with management.

RETAIL FOOD GROUP LIMITED

Lease accounting - estimate of lease arrears and assessment of recoverability of lease receivables (\$61.7m)

The Group has a significant lease portfolio that includes sub-lease arrangements with franchisees where the Group has entered into the head lease agreement with the landlord. Where the franchise store sub-lease is assessed by the Group as a finance lease using AASB 16 Leases, the Group recognise a finance lease receivable. Following this, the impairment requirements of AASB 9 Financial Instruments apply to the net investment in these leases. The Group determined their expected loss provisioning amounts using a forward-looking expected credit loss impairment model. This involves significant judgement as the expected credit loss reflects information about past, current and future conditions. Overall, the relative size of balances has a significant financial impact on the Group's financial position and performance. We involved our senior audit team members in assessing this key audit matter

CHRYSOS CORPORATION LIMITED

PhotonAssay operating lease income

PhotonAssay operating lease income was a key audit matter due to:

The quantum of operating lease income earned during the year, which comprised 92% of total revenue and other income.

The judgement required in applying revenue recognition and lease accounting standards to the PhotonAssay leases.

To classify each lease the Group applies judgement to assess whether the agreements transfer substantially all the risks and rewards of ownership of the underlying PhotonAssay assets. If this is the case, then the lease is a finance lease; if not, then it is an operating lease. Significant judgement is required to determine the lease term. Consideration is given to the non-cancellable periods and early cancellation penalties contained in the leasing arrangements. In assessing this key audit matter, we involved senior audit team members who understand the Group's business and industry.

INGHAMS GROUP LIMITED

Accounting for AASB 16 Leases – (right of use assets and lease liabilities amounting to \$1,031.7 million and \$1,138.4 million respectively)

AASB 16 Leases (“AASB 16”) is complex with specific lease-features driving different accounting outcomes, increasing the need for interpretation and judgement. AASB 16 Leases is a key audit matter due to the:

Relative materiality of the right of use assets and lease liabilities to the financial report.

Number of leases in the Group, including the individual nature of the lease agreements used to estimate the lease liability and right-of-use asset.

A focus for us was the accuracy of multiple and varied inputs which may drive different accounting outcomes, including key dates, fixed and variable rent payments, renewal options and incentives. The key areas of judgement we focussed on was in assessing the Group’s:

Renewal options contained within leases. Assessing the Group’s determination of whether it is reasonably certain renewal options will be exercised impacts the measurement of the lease, therefore is critical to the accuracy of the accounting.

Grower contractual arrangements and the features of the underlying grower contracts against the definition of a lease under the accounting standards.

Incremental borrowing rates determined by the Group. These are meant to reflect the Group’s entity specific credit risk and vary based on each lease term. We involved our senior audit team members in assessing these areas

SONIC HEALTHCARE LIMITED

Lease accounting

Lease accounting was a key audit matter due to the:

financial significance of lease liabilities and right-of-use assets to the consolidated balance sheet; and

significant judgements required by the Group such as determining the lease term and the incremental borrowing rate

UNIVERSAL STORE HOLDINGS LIMITED

Accounting for leases

Accounting for leases was a key audit matter due to the size of right-of-use assets and lease liability balances included in the financial report and the judgement involved in determining the balances, including the incremental borrowing rate used for discounting, accounting for leases in holdover and treatment of lease incentives and modifications.

BAPCOR LIMITED

Accounting for leases

At 30 June 2024, the Group recorded right of use assets of \$249.9 million and a lease liability of \$288.6 million. Accounting for leases was a key audit matter due to the financial significance of right-of-use assets and lease liability balances and the judgement involved in determining these balances, including the incremental borrowing rate and option renewals.

BIOXYNE LIMITED

Accounting for leases

The Group has significant lease arrangements. AASB 16 Leases, has introduced new complexities in lease accounting, requiring significant management judgment and estimation. This includes determining the lease term, discount rates, and the classification of leases as either operating or finance leases. Given the material impact on the financial statements and the complexity involved, accounting for leases was identified as a key audit matter

ALTERRA LIMITED

Leases

The Group has continued to recognise right-of-use assets and lease liabilities in relation to its lease arrangements over office premises and Carpenters plantation site. The majority of the right-of-use asset and lease liability recorded relates to the long-term Carpenters lease. Accounting for leases is a key audit matter as the balances recorded are material and there are significant judgements involved in determining the appropriate lease payments necessary to be used in the calculation of the lease liability and right-of-use asset

OOH MEDIA LIMITED

Lease Accounting

The accounting requirements of MSB 16 Leases are inherently complex, where specific and individualised lease-features drive different accounting outcomes, increasing the need for interpretation and judgement. This increases our audit effort and is a key audit matter. We focused on:

High volume of leases - the Group has a high volume of individualised lease agreements required to be assessed in determining the lease liability and right-of-use asset. A focus for us was the completeness of the lease population and the accuracy of multiple and varied inputs which may drive different accounting outcomes, including key terms of the lease agreements, such as key dates, fixed rent payments, renewal options and incentives.

Complex modelling process - the Group developed a lease calculation model, which is largely manual and complex, and therefore is at greater risk for potential error and inconsistent application.

Relative magnitude - the size of balances has a significant financial impact on the Group's financial position and performance.

The most significant areas of judgement we focused on were in assessing the Group's:

Incremental borrowing rates used - these reflect the Group's entity specific credit risk and vary based on each lease term. The Group periodically engages an external expert to assist with determining each of the Group's incremental borrowing rates.

Lease terms where leases have renewal options - assessing the Group's judgement of whether it is reasonably certain renewal options will be exercised impacts the measurement of the lease, therefore is important to the accuracy of the accounting. We involved our senior audit team members in assessing these areas

COLLINS FOODS LIMITED

Accounting for Leases

The Group applies Australian Accounting Standard AASB 16 Leases in accounting for the Group's portfolio of restaurant leases. As a result, Right-of-use assets and Lease liabilities are recognised in the balance sheet. We considered this a key audit matter given the financial significance of the related balances in the Group's balance sheet and the critical judgements used in determining the lease term assumptions in the lease calculations, as well as the significant amount of audit effort in auditing the balances.

Appendix D

SAMPLE CONSTRUCTION FOR DESCRIPTIVE STATISTICS IN REGARD TO FREQUENCY AND MAGNITUDE OF LEASE LIABILITES

The starting population is all Australian listed entities over the period from 2016 to 2024. We removed entities missing data on total assets, total revenue, shareholders' equity, net statutory income, or a GICS sector. We also removed entities in the GICS Sectors: financials (GICS #40), real estate (GICS #60) and mining (GICS Industry 151040). Finally, we removed entities with totals assets less than \$5 million.

The finance and real estate sectors were removed both because of their fundamental different business models to the typical firm (e.g. REITS and exchange traded funds) and the nature of the accounting is different. The mining sector was removed because of the predominance of Metals and Mining entities in the Australian economy

The size cutoffs in total assets are as follows. Micro (< \$m23); Small (>\$m23 and < \$m101); Medium (>\$101m and < \$593m) and Large (> \$m593).

Appendix E

METHODOLOGY FOR CLASSIFICATION OF KEY AUDIT MATTER SUBJECT MATTER

We classified the KAMs into subject matters based on the following three broad decision rules:

- First, if the subject matter was not an impairment and related to a specific primary financial statement account (e.g., revenue, receivables, inventory, provisions, leases) then that account was the category.
- Second, we had categories for any subject matter that related to impairments, and business combinations. The impairment category includes impairments regarding all assets.
- Finally, we had a range of subject matters that were relevant to the audit that may not directly affect a specific financial statement account (e.g., information technology, due to implementation of enterprise resource systems).

Attachment C: CPA Australia's Response to IFRS16 PIR (Draft)

Question 1(a)

In your view, is IFRS 16 meeting its objective (see page 9) and are its core principles clear? If not, please explain why not

Yes, in relation to Australian listed entities, CPA Australia is of the view that IFRS 16 meets its objectives, and its core principles are clear. Feedback received from the outreach and research activities we have undertaken supports our view. As you will be aware, IFRS Accounting Standards form the basis for financial reporting by all sectors in Australia. Whilst feedback from our commissioned research and outreach has indicated that the objective of IFRS 16 is being met for financial reporting by Australian listed entities, significant concerns have been raised about its suitability for other sectors including the Australian not-for-profit private and public sectors. Given the focus of the IASB is standard-setting for the global capital markets, we have restricted our views in this submission to that segment.

As noted in our cover letter, our above views are underpinned by ongoing commissioned research in collaboration with the University of Melbourne. Research report 1 (**Attachment B**) provides insights into some aspects of the impacts of IFRS 16 on Australian listed entities. We have also gathered additional feedback through our outreach activities as noted in our cover letter.

The standard has also achieved its intended objective of enhancing the usefulness of information for users. However, perceptions of usefulness remain diverse across different stakeholder groups, while some embrace the standard in terms of recognising lease commitments on balance sheets, some stakeholders such as banks and financial analysts seeing it as irrelevant and perform reversing adjustments for their specific decision-making purposes. Further consideration could be given to whether the accounting requirements more closely align with information needs of diverse user groups.

Question 1(b)

In your view, are the overall improvements to the quality and comparability of financial information about leases largely as the IASB expected? If your view is that the overall improvements are significantly lower than expected, please explain why.

Overall, the evidence indicates that IFRS 16 has delivered on its objective of bringing many leases onto the balance sheet and improving quality and comparability. However, concerns remain regarding operational comparability in complex situations and the practical relevance of reported information for key users. We recommend that these issues be considered and addressed following the PIR to further enhance the usefulness of the standard.

CPA Australia commissioned research (**Attachment B**) indicates that IFRS 16 has largely achieved the IASB's objective of improving the quality and comparability of lease information.

Evidence from research:

Analysis of Australian firms from 2019-2024 (**Attachment B**) shows that the principle of lease capitalisation is both widely understood and consistently applied. Adoption rates rose sharply at transition, with 92% of firms recognising lease liabilities in 2020 compared with 42% in 2019. By 2024, 84% of firms continued to recognise lease liabilities across all sizes and industries. Lease liabilities are also economically significant, with the median firm reporting leases equal to 45% of total debt. Recognition levels have remained stable since adoption, suggesting that compliance costs have not deterred ongoing application. Taken together, these findings indicate that IFRS 16 has materially changed reporting practices, enhanced transparency, and strengthened comparability across firms and industries.

Concerns raised in feedback:

While the overall improvements are evident, in our outreach activities, stakeholders identified areas where challenges remain:

- **Comparability challenges:** Many lease accounting systems cannot fully address complexities such as lease modifications, variable payments, subleases, and sale-and-leasebacks. This often results in manual adjustments outside the system, increasing inconsistencies. Differences in system design (lease contract asset management vs. lease accounting) also lead to divergent outcomes, reducing comparability across the market.
- **Relevance for key stakeholders:** Some Australian banks routinely exclude IFRS 16 adjustments when monitoring debt covenant compliance, preferring to focus on future lease commitments. Similarly, many organisations reverse IFRS 16 adjustments in external market communications – for example, reporting EBITDA and cash flows on a pre-IFRS 16 basis for consistency with peers, competitors, and US-GAAP practice. This suggests that while the standard has improved statutory comparability, its decision-usefulness for key stakeholders is reduced in practice, as both preparers and users treat leases as ordinary operating costs rather than financing.

Question 1(c)

In your view, are the overall ongoing costs of applying the requirements and auditing and enforcing their application largely as the IASB expected? If your view is that the overall ongoing costs are significantly higher than expected, please explain why, how you would propose the IASB reduce these costs and how your proposals would affect the benefits of IFRS 16.

In the context of Australian listed entities, CPA Australia commissioned research (**Attachment B**) indicates that the auditing of lease-related requirements under IFRS 16 is not generally associated with unexpectedly high costs. As noted in the sample-based analysis in Research Report 1 of Key Audit Matters (KAM) (refer also to our response to Question 1(a)), leases were identified as a KAM in only 4% of audit reports across Australian listed companies. This suggests that lease accounting is not typically regarded as a significant source of audit complexity or cost. Where lease-related KAMs did arise, they were concentrated in consumer sectors with high exposure to retail premises and primarily related to economic significance or the exercise of professional judgment around matters such as discount rates. Importantly, the review did not reveal unforeseen areas of estimation uncertainty or judgement. These findings support the view that the auditing of financial information arising from IFRS 16 results in satisfactory outcomes overall and the standard is operating as intended and without undue burden.

Whilst the overall feedback has been positive, some concerns and areas for improvement have also been identified, particularly for smaller listed entities. The main concerns raised can be summarised as follows:

- **Contradictions in requirements:** Stakeholders noted that the standard demands highly precise calculations in some areas (e.g., discount rates) while allowing broad judgment in others (e.g., portfolio application). This inconsistency increases ongoing cost without necessarily improving the usefulness of the information.
- **Limited relevance to some users:** Feedback suggested that measurement outputs are often ignored or excluded by banks and internal management, who prefer to focus on future lease commitments or cash flows. Many of the responses we received focused on property leases, questioning whether the complexity and cost of maintaining compliance is justified by the decision-usefulness of the information, particularly for common office leases or multiple small landlord arrangements.
- **Higher relative cost on smaller listed entities:** Larger organisations are generally able to absorb IFRS 16 requirements with access to better systems and resources, while smaller entities face disproportionately high costs. Lease calculations relating to remeasurement are not as reliable with less sophisticated software solutions, forcing more manual intervention, and compliance costs represent a significant proportion of resources relative to firm size.
- **Complexity versus substance:** Some stakeholders have expressed a view that IFRS 16 transforms what are, in practice, straightforward rent payments into a complex series of accounting entries (right-of-use assets, liabilities, interest expenses, and amortisation costs). They view this as detached from the commercial

substance of leases, particularly for smaller entities. Moreover, as noted above, banks and internal management often reverse or ignore the adjustments, focusing instead on cash flows. This raises some concern that the ongoing costs of complying with IFRS 16 are higher than anticipated, with some estimating compliance with IFRS 16 drives around 20% of audit fees.

- **Lack of a clear benchmark for costs:** Stakeholders noted that while most preparers agree compliance costs are higher than anticipated, it is difficult to assess whether these costs are truly “excessive” in the absence of a clear benchmark of what ongoing costs were expected to be. This lack of a reference point makes evaluation inconsistent and subjective.

In summary, our commissioned research suggests that from an audit perspective, IFRS 16 has not created greater-than-expected burdens. Nonetheless, stakeholder feedback through our outreach activities highlights genuine concerns about the uneven distribution of costs across different company sizes, the perceived disconnect between accounting complexity and economic reality, and the absence of clear cost benchmarks. We recommend that the IASB consider these issues in the PIR, particularly by:

- evaluating whether additional simplifications or reliefs are warranted for listed SMEs
- assessing whether the accounting requirements could be better aligned with the economic substance of leases in practice
- clarifying expectations about the appropriate level of costs to support consistent evaluation in future reviews.

Question 2(a)

Do you agree that the usefulness of financial information resulting from lessees’ application of judgement is largely as the IASB expected? If your view is that lessees’ application of judgement has a significant negative effect on the usefulness of financial information, please explain why.

We agree that, overall, the usefulness of financial information resulting from lessees' application of judgement is largely as the IASB expected. The exercise of judgement that results in IFRS 16-based lease accounting information has increased transparency and provided users with a clearer view of financial obligations relating to leases. Our commissioned research also indicates that recognition levels have remained high and stable, suggesting that preparers are exercising judgement consistently, resulting in information that is relevant and faithfully representative.

However, feedback received highlights that perceptions of usefulness vary considerably between different user groups:

- **Divergent stakeholder perspectives:** Some preparers and auditors view the information as burdensome or less relevant to decision-making, whereas others—such as credit rating agencies—value it highly, as it aligns with their long-standing practice of capitalising lease commitments. This suggests that usefulness depends on the stakeholder’s perspective and objectives.
- **Banks and internal management:** As noted in our response to Question 1(b), some banks and internal management teams routinely exclude IFRS 16 information, focusing instead on cash flows and future lease commitments. This practice indicates that for certain key users, the usefulness of IFRS 16 arising from information may not be as high as expected.
- **Analysts and transaction-focused users:** Feedback also indicated that analysts often find the information more difficult to reconcile for comparability and valuation purposes, particularly in merger and acquisition scenarios. This adds complexity to their work and may reduce the perceived usefulness of the information.

Question 2(b)

Do you agree that the requirements in IFRS 16 provide a clear and sufficient basis for entities to make appropriate judgements and that the requirements can be applied consistently? If not, please explain why not.

We agree that, in general, IFRS 16 provides a clear and sufficient basis for entities to exercise appropriate judgement and apply the requirements consistently. Our commissioned research indicates that the principle of lease capitalisation is widely understood and consistently applied across firms, suggesting that the core framework is sound and workable in practice.

Some stakeholder feedback received however highlights that challenges remain in more complex areas of application as set out below:

- **Determination of lease term:** To assist with lease-term determination, stakeholders noted that the relevant IFRIC agenda decision has been relied upon to resolve ambiguities, such as how to define lease term when contracts lack explicit extensions. However, these clarifications are not always easily accessible, being included as separate literature on the IASB website.

In practice, this has resulted in inconsistent application across entities. For example, there is diversity in the application of lease-term thresholds when assessing whether lease extensions are “reasonably certain.” These differences can materially affect reported lease liabilities and ratios such as return on assets, undermining comparability.

We also understand diversity exists in how retailers assess “reasonably certain” extension options, particularly for long retail leases. Different interpretations can materially affect reported assets, liabilities, and performance ratios, suggesting a need for clearer guidance.

In short, while IFRS 16 provides a framework for determining lease term, its application remains highly judgemental and resource-intensive. Concerns remain in terms of inconsistent outcomes and limited comparability in practice, particularly for smaller entities. Feedback strongly supports the need for clearer, more integrated guidance and practical examples, particularly for land and building leases, to reduce complexity and ensure the requirements deliver meaningful and useful information.

- **Fragmentation of Guidance and Role of Agenda Decisions:** We note that IFRIC has already issued six separate agenda decisions relating to IFRS 16 since its introduction:
 - i. Lease Term and Useful Life of Leasehold Improvements (Nov 2019)
 - ii. Definition of a Lease (Dec 2019)
 - iii. Sale and Leaseback with Variable Payments (Jun 2020)
 - iv. Non-refundable VAT on Lease Payments (Apr 2021)
 - v. Lessor Forgiveness of Lease Payments (Oct 2022)
 - vi. Definition of a Lease—Substitution Rights (Apr 2023)

The volume and breadth of these decisions indicate that preparers and auditors frequently encounter interpretative challenges in applying the standard. Relying on agenda decisions as the primary mechanism for clarification risks fragmenting the guidance, creating accessibility issues, and leading to inconsistent application. We therefore recommend that the IASB considers formally incorporating the substance of these agenda decisions into IFRS 16, either as practical expedients or integrated guidance, to improve clarity, consistency, and accessibility.

- **Lease modifications:** Preparers often confuse modifications with remeasurements, particularly for CPI-driven rent resets or umbrella agreements covering multiple assets. For example, some preparers incorrectly apply modification provisions and update discount rates when variable lease payments change, even though these should be treated as remeasurements. This lack of understanding adds unnecessary cost and inconsistency, highlighting the need for clearer guidance and practical examples.

From an auditing perspective, modification versus remeasurement is also a recurring source of difficulty. This often leads to disagreements between preparers and auditors, giving rise to time and cost pressures. Regulatory issues in the Australian environment further compound the problem. Local legal practice often involves extending leases by amending the original contract rather than creating a new one, with resets every few years. This structure does not align neatly with the accounting requirements of IFRS 16, creating ambiguity in

distinguishing between new leases and modifications. Such mismatches increase compliance costs and uncertainty, particularly for mid-sized entities.

In short, stakeholders viewed the current lease modification requirements as complex and judgement-heavy, creating recurring compliance costs. They emphasised the need for simplification and clearer practical guidance to reduce burden while maintaining transparency.

- **Lease incentives:** We previously raised this matter in our 2019 **submission** to the IASB, highlighting concerns around the accounting for lease incentives under IFRS 16, particularly in relation to:
 1. whether lease incentives should be excluded from both the right-of-use asset and lease liability, or whether a separate lease incentive liability should be recognised (Issue 1 in our submission), and
 2. whether reimbursements for leasehold improvements should fall within the scope of the definition of lease incentives (Issue 2 in our submission).

These uncertainties created the potential for inconsistent practices and undermined comparability, as evidenced by divergent interpretations amongst preparers and auditors. In response, the IASB's 2020 Annual Improvements amended Illustrative Example 13 by deleting the reference to leasehold improvements, primarily to avoid confusion. While this action removed a source of inconsistency in the example, it did not substantively address the underlying interpretative questions raised by stakeholders. Accordingly, the treatment of lease incentives continues to lack clarity, and diversity in practice may persist, warranting further consideration as part of the post-implementation review.

- **Low value leases:** Stakeholders noted that materiality remains an unresolved issue, with current exemption thresholds (USD\$5,000 noted in the Basis for Conclusions for low value assets) set too low to be meaningful. In practice, these thresholds often capture only minor items such as personal computers, while most lease value is concentrated in a small number of significant contracts (e.g. 20 leases covering around 90% of value of all leases held by the entity). As a result, entities still need to apply lease accounting to numerous low-value items, creating unnecessary burden. Stakeholders suggested clearer principles that explicitly allow immaterial leases to be disregarded while ensuring materially significant assets are recognised.
- **Variable lease payments:** Current requirements prohibit the estimation of variable lease payments linked to consumer price index (CPI) or market rent reviews unless a floor exists. This can exclude substantial obligations from lease liabilities, reducing consistency and making like-for-like comparisons difficult.

Overall, we believe IFRS 16 sets out a sufficiently clear and consistent framework for judgement. However, complex areas, particularly around areas noted above, would benefit from more integrated and transparent guidance incorporated directly within the standard. This would help reduce reliance on a number of Agenda Decisions and promote more consistent application across all entities, including smaller and resource-constrained entities.

Question 2(c)

If your view is that the IASB should improve the usefulness of financial information resulting from lessees' application of judgement, please explain: (i) what amendments you propose the IASB make to the requirements (and how the benefits of the solution would outweigh the costs); or (ii) what additional information about lessees' application of judgement you propose the IASB require entities to disclose (and how the benefits would outweigh the costs)

See our response to Question 2(b) above.

Question 3

Do you agree that the improvements to the quality and comparability of financial information about lease-related cash flows that lessees present and disclose are largely as the IASB expected? If your view is that the improvements are significantly lower than expected, please explain why.

We acknowledge that overall, IFRS 16 has improved the quality and comparability of lease-related cash flows by requiring greater disclosure.

However, some stakeholders have raised concerns that some of the cash flow-related characteristics of certain leases. In particular, we understand there is inconsistency in how lease payments are classified in the cash flow statement, and the separation of cash flows into operating and financing categories results in useful information for decision-making purposes.

Some stakeholders have also observed that there is no clear distinction of cash flows now between assets that are essentially purchased through debt-financing (finance leases under IAS 17) and assets that are 'rented' for operational requirements (operating leases under IAS 17). From a user perspective, this treatment overcomplicates what is essentially a straightforward cost of doing business.

The IASB may wish to consider developing requirements that provide further clarity around cash flows relating to leases in its project on Cash Flows and Related Matters.

Question 4(a)

Do you agree that the ongoing costs of applying the measurement requirements in IFRS 16 are largely as the IASB expected? If your view is that the ongoing costs are significantly higher than expected, please explain why, considering how any entity-specific facts and circumstances (such as IT solutions) add to these costs.

See our response to Question 1(c) above.

Question 4(b)

If your view is that the ongoing costs are significantly higher than expected, please explain how you propose the IASB reduce these costs without a significant negative effect on the usefulness of financial information about leases.

See our response to Question 1(c) above.

Question 5

Based on your experience with the transition to IFRS 16, would you recommend the IASB does anything differently when developing transition requirements in future standard-setting projects? If so, please explain how your idea would ensure: (a) users have enough information to allow them to understand the effect of any new requirements on entities' financial performance, financial position and cash flows; and (b) preparers can appropriately reduce their transition costs when implementing new requirements for the first time.

Overall, feedback we have received indicates that the transition approach adopted for IFRS 16 worked well and provided an effective and appropriate balance between providing useful information for users and cost relief for preparers.

- **Transition choices:** The availability of both full retrospective and modified retrospective approaches was also seen as a positive. This allowed flexibility for entities, with most opting for the modified retrospective method, while those seeking greater comparability were still able to apply full retrospective transition.
- **Contextual challenges:** Some stakeholders noted that the onset of COVID-19 coincided with adoption, which diverted resources and meant there were competing and sometimes more important priorities for preparers, which may have led to some treating initial application of the standard as a compliance exercise. The real challenges only emerged later once entities had more capacity to engage with the requirements. It is therefore difficult to isolate whether any transition issues were due to the design of the transition provisions or the unusual circumstances of implementation.
- **Grandfathered contracts:** Additional feedback suggested that issues have since emerged where grandfathered contracts unexpectedly trigger reapplication of IFRS 16 due to subsequent modifications or renegotiations. Even minor changes in long-term contracts can cause material balance sheet impacts, adding significant judgement and complexity when historical data was not captured at transition. Stakeholders recommended that grandfathered contracts remain exempt from reapplication, or that immaterial modifications should not trigger full reassessment, to avoid disproportionate costs.

At this stage, we have not identified any additional suggestions other than the observations above, to assist the IASB in establishing transition provisions for future standards.

Question 6.1(a)

How often have you observed the type of rent concession described in Spotlight 6.1?

Question 6.1(b)

Have you observed diversity in how lessees account for rent concessions that has had, or that you expect to have, a material effect on the amounts reported, thereby reducing the usefulness of information?

Question 6.1(c)

If your view is that the IASB should act to improve the clarity of the requirements, please describe your proposed solution and explain how the benefits of the solution would outweigh the costs.

No further comments.

Question 6.2(a)

How often have you observed difficulties in assessing whether the transfer of an asset in a sale and leaseback transaction is a sale?

Question 6.2(b)

Have you observed diversity in seller-lessees' assessments of the transfer of control that has had, or that you expect to have, a material effect on the amounts reported, thereby reducing the usefulness of information?

Question 6.2(c)

If your view is that the IASB should act to help seller-lessees determine whether the transfer of an asset is a sale, please describe your proposed solution and explain how the benefits of the solution would outweigh the costs.

We have received limited feedback that indicates that sale-and-leaseback transactions are one of the more complex and judgement-heavy areas of IFRS 16, with difficulties in assessing whether transfers qualify as true sales, with diversity in practice leading to inconsistent recognition of gains, losses, and lease liabilities. These inconsistencies, arising in hybrid or partial asset transfers, undermine comparability and reduce the usefulness of reported information. Stakeholders recommended clearer, dedicated guidance within IFRS 16 itself, including criteria for assessing sales, treatment of subsequent modifications, and illustrative examples to improve consistency.

Some of the specific concerns raised include:

- **Whether transfer constitutes a sale:** Stakeholders observed they encountered difficulties frequently in assessing whether a transfer constitutes a true sale, noting IFRS 16 provides limited guidance on this point, leaving them reliant on the 'transfer of control' framework enshrined in IFRS 15. This has created uncertainty, particularly in hybrid or complex transactions (for example, where only part of a building or infrastructure asset is transferred).
- **Diversity in practice and impact:** Some entities conclude transactions are sales, while others treat them as failed sales (transactions that do not qualify as a 'sale' under IFRS 15), leading to inconsistent recognition of gains/losses and ROU assets/lease liabilities. Inconsistent approaches also arise from reassessments where "unit of account" questions are handled differently (e.g., entire asset vs. physically distinct components). This divergence undermines comparability and reduces the usefulness of reported information.

Stakeholders have recommended that the IASB develop clearer, dedicated guidance for sale-and-leaseback accounting, rather than relying on references to IFRS 15 and IFRS 9. Key areas for improvement include:

- Clarifying the criteria for assessing whether a transfer is a true sale or a failed sale, possibly by embedding principles similar to those used in IFRS 3 for valuing asset acquisitions as part of business combinations, which separate different transaction components.
- Providing guidance on how to treat subsequent events or modifications – i.e., whether and when reassessment or modification is required.
- Addressing conceptual inconsistencies between IFRS 15, IFRS 9 and IFRS 16, so preparers are not left unclear on which path to follow for specific fact patterns.
- Developing and providing further illustrative examples, including for partial asset transfers and hybrid arrangements (e.g., one floor of a building), to improve comparability in practice.

Question 6.3(a)

Do you agree that restricting the amount of gain (or loss) an entity recognises in a sale and leaseback transaction results in useful information?

Question 6.3(b)

What new evidence or arguments have you identified since the IASB issued IFRS 16 that would indicate that the costs of applying the partial gain or loss recognition requirements, and the usefulness of the resulting information, differ significantly from those expected?

Question 6.3(c)

If your view is that the IASB should improve the cost-benefit balance of applying the partial gain or loss recognition requirements, please describe your proposed solution.

We have no further comments other than those provided in our response to Question 6.2 above.

Question 6.4

Are there any further matters the IASB should examine as part of the post-implementation review of IFRS 16? If so, please explain why, considering the objective of a post-implementation review as set out on page 5

Based on feedback and observations, we suggest the IASB examine the following matters as part of the PIR of IFRS 16. These are some of the areas identified by our stakeholders as more challenging to apply as part of the IFRS 16 requirements:

- **Use of lease liabilities in performance metrics:** As noted in our commissioned research (Attachment B), among Australia's largest lease-intensive firms, most include lease liabilities in Return on Invested Capital (ROIC) calculations. However, a notable minority exclude them, which may lead to inconsistent or potentially misleading performance measures. Whilst we appreciate this would be considered 'non-IFRS' information, the inconsistent approaches taken to presenting IFRS 16-based information as part of financial ratios could have an impact on information presented as management performance measures under IFRS 18.
- **Interest rate implicit in the lease vs incremental borrowing rate (IBR):** Our research indicates that auditing the Standard is not generally associated with high costs (see our response to Question 1(c)). Leases were identified as a Key Audit Matter (KAM) in only 4% of audit reports for Australian listed companies, concentrated mainly in retail sectors where lease exposures are significant. This suggests that, overall, the auditing of IFRS 16 is functioning as intended and does not impose an undue burden. The primary area where challenges arise is in the determination of discount rates (particularly IBR) which requires significant judgement and is often the focus of audit attention.

Beyond our research findings, stakeholders consistently noted that determining the IBR represents one of the more judgement-intensive aspects of applying the Standard, given that the implicit rate is rarely observable for property leases. Entities therefore default to using the IBR, which requires assumptions about credit risk, lease terms, and financing conditions. While workable, this approach creates variation across entities, as methodologies and inputs differ. Stakeholders also noted that although a portfolio-based approach to discount rates (e.g., using standardised rates for 3-, 7- or 15-year leases) could improve consistency, most systems are not equipped to support this, forcing companies into manual workarounds and increasing inconsistency in practice.

In short, while the Standard has not created widespread auditing challenges, the area of discount rate determination, particularly reliance on the IBR in the absence of practical implicit rates, remains one of the more complex and judgement-heavy aspect of assurance under the standard.