

IASB[®] meeting

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Topic	Feedback summary—users of financial statements
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Purpose and structure of this paper

1. This paper summarises feedback from users of financial statements (users) on the *Request for Information Post-implementation Review of IFRS 16 Leases* (RFI) and is set out as follows:
 - (a) key messages (paragraphs 3–5);
 - (b) types of user feedback (paragraphs 6–7);
 - (c) users' overall assessment of IFRS 16 (paragraphs 8–14);
 - (d) users' perspectives on the usefulness of information resulting from lessees' application of judgement (paragraphs 15–25);
 - (e) users' perspectives on the usefulness of information about lessees' lease-related cash flows (paragraphs 26–31);
 - (f) users' comments on transition to IFRS 16 (paragraphs 32–35);
 - (g) users' other comments (paragraphs 36–41); and
 - (h) question for the International Accounting Standards Board (IASB).
2. This paper does not ask the IASB for any decisions.

Key messages

3. Broadly consistent with the feedback that informed the RFI, many users see leases as debt-like transactions and many users' overall assessment of IFRS 16 has been positive. In these users' view, the Standard has met its objective, it has significantly improved the quality of financial information, and the overall benefits are largely as the IASB expected. Most of those users who provided positive feedback also raised some concerns, but despite these concerns, they did not recommend any fundamental changes.
4. Most users that commented raised concerns about the usefulness of information resulting from the application of judgement. Many users suggested the IASB consider explicitly requiring lessees to disclose information about judgements and assumptions in determining lease terms and discount rates.
5. Most users that commented provided negative feedback or raised various concerns about the usefulness of information about lessees' lease-related cash flows.

Types of user feedback

6. The IASB received three comment letters from organisations representing users' interests (user organisations) from Europe and Asia-Oceania. We also considered user feedback that some respondents to the RFI (mostly national standard-setters) explicitly highlighted in their comment letters. In addition, we received written comments from some members of the user advisory committee of a national standard-setter from North America.
7. Following the publication of the RFI in June 2025, IASB members and the staff held or participated in 12 meetings with users, comprising:
 - (a) eight meetings with individual users or groups of users (including equity analysts, asset managers, institutional investors and debt investors) from Asia-Oceania, North America and Europe;

- (b) two meetings with global credit rating agencies; and
- (c) two meetings with European user organisations.

Overall assessment of IFRS 16

8. Almost all users provided their overall assessment of IFRS 16. Of those users:

- (a) many provided positive feedback (paragraphs 9–11);
- (b) some provided negative feedback (paragraphs 12–13); and
- (c) some provided mixed feedback (paragraph 14).

Positive feedback

9. Many users provided positive feedback on IFRS 16 as a whole. These users see leases as debt-like transactions. They said the Standard has met its objective, it has significantly improved the quality of financial information, and the overall benefits are largely as the IASB expected. Users' other comments included:

- (a) some users explicitly said IFRS 16 reduced the need to adjust amounts that lessees report in their financial statements.
- (b) a credit rating agency said IFRS 16 has been very successful, and it has improved financial information significantly. The user explicitly stated that they view all leases as debt-like transactions but there are some entities (such as entities in telecommunications or retail sectors) who still disagree with this view and reverse the effects of IFRS 16. In addition, the user stated that in their analyses they adjust information reported in accordance with FASB ASC Topic 842, Leases, to reflect IFRS 16's reporting requirements.
- (c) a user organisation from Europe said IFRS 16 improves comparability, particularly between entities from lease-intensive sectors, such as telecommunications, retail and airlines. A few users from Asia-Oceania said

the quality of financial information provided by an entity is more important than the comparability of financial information between entities.

- (d) a user from Asia-Oceania said IFRS 16 was implemented at the right time because it provided much needed transparency during the covid-19 pandemic. However, in this user's view, insufficient disclosures about rent-free periods, term extensions, temporary closures and relocations of leased assets made financial statements difficult to understand and analyse.
- (e) a user organisation from Europe said IFRS 16 requirements result in better information about significant lease contracts that help users ask the right questions of an entity's management.
- (f) a credit rating agency said there are still some structuring opportunities (for example, short-term leases), but on a much smaller scale than before IFRS 16.

10. However, of the users who provided positive overall feedback about IFRS 16 as a whole, most still expressed some level of concern:

- (a) most raised concerns about the usefulness of information resulting from the application of judgement (paragraphs 15–25); and
- (b) most raised concerns about the usefulness of information about lessees' lease-related cash flows (paragraphs 26–31).

11. But despite these concerns, they did not recommend any fundamental changes. This sentiment is well reflected in a European user organisation's overall conclusion that '[d]espite its limitations, the [S]tandard has achieved its primary objective and improved financial reporting. A radical overhaul does not seem necessary, but minor adjustments should be considered to facilitate simpler and more consistent application'.

Negative feedback

12. Some users (including most users from Australia, New Zealand and Brazil and many users from Canada) said IFRS 16 does not provide useful information, and they

expressed negative overall views about the Standard and the resulting financial information, mainly because:

- (a) they disagree with the accounting for leases as *debt-like transactions*. Instead, they treat leases as operating activities and reverse the impact of IFRS 16 to analyse performance, and to compare and value entities. Users from Brazil said that because of this, in their view, IFRS 16 has not achieved its objective, as the resulting information does not faithfully represent leases. Users from Canada and New Zealand said that most lending agreements remain based on pre-IFRS 16 metrics, so entities continue disclosing pre-IFRS 16 information treating rent as an operating expense. A user said lessees can sublease their right-of-use assets or cancel the contract (extinguish the liability) without the need to repay the entire outstanding amount of lease liability and this differentiates it from other forms of debt.
- (b) there are significant *comparability challenges* that arise from:
 - (i) the lessees' application of judgement in determining lease terms or discount rates and identifying whether a contract contains a lease. In these users' view, this leads to inconsistent application and has a negative effect on the usefulness of financial information. The users said entities with identical business models can look materially different depending on how their leases are structured and accounted for.
 - (ii) a lack of comparability with Topic 842. In these users' view, because US-based analysts might be less familiar with IFRS 16, entities reporting leases in accordance with IFRS 16 might be in a less favourable position compared to their peers who report leases in accordance with Topic 842. A standard-setter from Latin America said that many stakeholders in their jurisdiction (including users) consider information provided in accordance with Topic 842 more useful than information provided in accordance with IFRS 16. In these stakeholders' view, '[t]he US GAAP model better aligns with users'

expectations and reflects the economic substance of leases that do not transfer ownership risks or rewards'.

- (iii) differences in accounting for fixed lease payments and variable lease payments that are not included in the measurement of the lease liability. In these users' view, this complicates comparisons between, for example, retailers who might have different volumes of variable and fixed lease payments.
- (iv) inflation-linked lease payments that are not estimated using future inflation rates, despite such rates being available.

(c) overall, IFRS 16 is *complex*, and it is making it harder than ever to assess the real underlying performance of a business because:

- (i) it brings significant disruption to EBITDA metrics, which is a key metric in calculating free cash flows;
- (ii) the front-loading of interest expense creates an artificial expense pattern that does not reflect the actual, often stable lease payments;
- (iii) presenting a short-term portion of lease liabilities distorts current ratios in such a way that an entity with positive cash flows and significant lease commitments might appear to have liquidity issues;
- (iv) separating interest on lease liabilities from other financial expenses requires additional analysis to understand 'true' interest coverage ratios, complicating debt covenant assessments;
- (v) lease-related disclosures are often presented across various notes; and
- (vi) some entities continue to provide pre-IFRS 16 information, while others report only information in accordance with IFRS 16.

13. Of the users who provided negative feedback about IFRS 16 as a whole, only a few would be in favour of major changes, such as:

- (a) withdrawal of IFRS 16 and reinstatement of IAS 17 *Leases*; or

- (b) requiring similar disclosures to those that were required in paragraphs 31(b) and 35(a) of IAS 17. Paragraph 31(b) of IAS 17 required lessees in finance leases to disclose a reconciliation between the total of future minimum lease payments and their present value. Paragraph 35(a) of IAS 17 required lessees in operating leases to disclose the total of future minimum lease payments under non-cancellable leases.

Mixed feedback

- 14. Some users provided mixed feedback about IFRS 16 as a whole—they said IFRS 16 is meeting its objective, but the nature or the extent of their comments indicates that they disagree with some key concepts and core principles in the Standard. Their comments included:
 - (a) IFRS 16 has achieved its objective. However, its decision-usefulness for some key stakeholders (for example, banks that routinely exclude IFRS 16 adjustments when monitoring debt covenant compliance, preferring to focus on future lease commitments) is reduced in practice.
 - (b) a credit rating agency acknowledged that IFRS 16 reduced the need to adjust amounts reported by entities in their financial statements. However, it noted that:
 - (i) IFRS 16 increased the time that they spend analysing the amounts, for example, to identify any outliers in determined lease terms—in which case they make their own estimates of the lease liability.
 - (ii) the accounting for variable lease payments might incentivise entities to structure lease contracts to avoid recognition of (or recognise a lower amount of) lease liability (see paragraph 36(b)).
 - (iii) they treat all leases as services except for long-term leases in sectors where physical locations or transportation assets are essential to their core business, such as: airlines, shipping, food retail, non-food retail, restaurant entities or hotels. When analysing leverage for entities in

these sectors, they use lease liabilities reported in accordance with IFRS 16 (or Topic 842).

- (iv) they often need to talk to the entity's management to get an understanding of the entity-specific information they consider to be missing.
- (c) a user from Asia-Oceania said the information presented in the statement of financial position is useful, because there is more transparent information about leases, but expressed concerns about the presentation of leases in other primary financial statements and explained adjustments they make (see paragraph 27(c)). Similar to the credit rating agency, the user said public entities in their jurisdiction do not usually disclose the basis for their judgements, so they need to ask entities for additional information.

Usefulness of information resulting from lessees' application of judgement

Lease term

- 15. Many users commented on the application of the lease term requirements. A few users (including a credit rating agency) expressed little or no concerns—their comments included:
 - (a) the lease term requirements in IFRS 16 are similar to those in IAS 17. The use of judgements is acceptable and there is some level of assurance when financial statements are audited or reviewed.
 - (b) based on our reasonableness tests of lease liabilities that entities report, we do not see manipulations after five years of applying the Standard.
- 16. Of the many users who commented, most users expressed some concerns about the lease term determination and provided suggestions for improvements (see paragraphs 21–22). Users' comments included:

- (a) judgement in determining lease terms creates opportunities for structuring contracts, hinders comparability and complicates users' analyses. Users said they generally expected to see higher lease liabilities on entities' balance sheets on transition to IFRS 16 than those that entities reported. In these users' view, some entities have strategically shortened lease terms to reduce reported liabilities. A few users noted an unexpected volatility in balance sheet amounts when lease contracts are renewed (or lease terms are reassessed), which they do not find useful. A credit rating agency said they adjust reported lease liabilities in their models to remove the fluctuations related to lease renewals (that is, they assume that leases will be renewed perpetually).
- (b) entities are determining unrealistic lease terms that are inconsistent with, for example, an entity's past practice or an entity's business model, which undermines the credibility of management's judgements. A user provided two examples:
 - (i) a logistics entity entered into a one-year lease contract, renewable every year and determined the lease term to be one year. But the entity had a licence to operate for 15 years, it was not planning to cease or limit its operations soon and would typically lease trucks for 15 years. So, users would reasonably expect a lease liability to reflect a lease term of approximately 15 years.
 - (ii) a telecommunication entity determined the lease term for a mobile network tower to be five years, which is not matched by the telecom operator's service licence with a term of about 20 years.
- (c) determining the lease term, in particular the assessment of extension or termination options, is the most challenging area of judgement that might hinder comparability of reported financial information. A credit rating agency said they mostly rely on judgements entities make, because, in their view, the entities have better knowledge of their business and lease arrangements. However, in some cases, lease terms that entities determined were inconsistent

with the user's expectations, in which case they said they might make qualitative adjustments to the entity's credit rating.

Discount rates

17. Many users commented on the usefulness of information resulting from lessees' application of judgement in determining discount rates.
18. Most of them raised some concerns about the use of judgement in determining discount rates and how it hinders comparability of financial information. Users' comments included:
 - (a) using incremental borrowing rates results in artificial differences when entities of different credit standings enter identical leases—they report different lease liabilities even if they lease the same asset; and
 - (b) the measurement of the lease liability is one of the 'controversial points' in IFRS 16 because it is highly dependent on management's judgement in determining discount rate (and lease term).
19. However, some users, including a credit rating agency, expressed little or no concerns about the usefulness of information resulting from the application of judgement in determining discount rates. Users' comments included:
 - (a) discount rates determined in accordance with IFRS 16 are more accurate than the estimates reported when leases were off balance sheet, even if determining discount rates requires judgement.
 - (b) insufficient information about discount rates is less problematic than insufficient information about lease terms. This user said they can check whether an entity's assumptions about discount rates are reasonable by discounting lease payments (disclosed in maturity analysis required by IFRS 7 *Financial Instruments: Disclosures*), using their own discount rates, and comparing their calculation of the net present value with the carrying amount of lease liabilities reported by the entity.

Variable lease payments

20. A few users highlighted variable lease payments as an area of judgement which they are concerned with but provided no further details. Some users raised broader concerns about the accounting for variable lease payments, which we discuss in more detail in paragraph 36.

Suggestions to improve the usefulness of information resulting from lessees' application of judgement

21. A user said standard-setting cannot resolve matters that indicate non-compliance with the requirements or inappropriate exercise of judgement. Conversely, a national standard-setter reported that although users in its jurisdiction acknowledge that the current requirements are generally clear and applicable, they are of the opinion that clearer guidance on variable lease payments, optional lease periods and discount rate determination would reduce differences in judgement. However, other users acknowledged that judgement is required because of varying facts and circumstances and said that improving the financial information resulting from the application of this judgement would be challenging.

22. Many users suggested that the IASB should explicitly require entities to disclose information about judgements and assumptions in determining *lease terms*. A user organisation from Asia-Oceania said information that lessees currently provide in accordance with paragraph 59 of IFRS 16 is insufficient to meet the disclosure objective in the Standard. Other suggestions for the IASB to consider that one or a few users provided included requiring lessees to disclose:

- (a) information about the useful life (or at least a range of useful lives) of underlying assets to improve comparability of information between lessees and entities that purchase assets;
- (b) comparison of current lease term with the average period over which the entity typically uses the underlying asset;

- (c) minimum and maximum contractual terms;
- (d) the proportion of the lease liability that is subject to extension or termination options;
- (e) more granular disclosure of expected lease renewals;
- (f) weighted-average lease term; or
- (g) the range of lease terms by classes of assets.

23. Many users suggested that the IASB should explicitly require entities to disclose information about judgements and assumptions in determining *discount rates*. A few users suggested requiring lessees to disclose their weighted-average discount rate.

24. A few users (including a credit rating agency) suggested that the IASB should require lessees to disclose more detailed information about their *variable lease payments*, including:

- (a) contractual details and nature of variable lease payments for users to understand to what extent the payments are genuinely variable or in-substance fixed;
- (b) material accounting policy information to enable users to understand why certain variable lease payments are expensed or included in measurement of lease liabilities; and
- (c) sensitivity analysis showing, for example, how the lease expense would have changed in response to a change in revenue.

25. There were limited suggestions from users to amend the requirements that require judgement. The suggestions included that the IASB should consider developing:

- (a) detailed requirements to distinguish in-substance fixed payments from variable lease payments;
- (b) further guidance to help entities apply judgement in determining lease term;

- (c) requirements to disclose the potential effect of renewal options (rather than including renewal options in the measurement of the lease liability); and
- (d) an overarching concept of discount rates across IFRS 16, IFRS 9 *Financial Instruments* and IAS 36 *Impairment of Assets*.

Usefulness of information about lessees' lease-related cash flows

- 26. Most users commented on the usefulness of information about lessees' lease-related cash flows. Of these users:
 - (a) most provided negative feedback or raised various concerns about:
 - (i) classification and presentation of lease-related cash flows (see paragraph 27);
 - (ii) complexity of information about cash flows (see paragraph 28);
 - (iii) lack of comparability between lessees and entities that borrow to buy assets (see paragraph 29); and
 - (iv) quality of information (see paragraph 30); and
 - (b) a few others provided overall positive feedback but highlighted challenges that they face when analysing lessees' lease-related cash flows (see paragraph 31).
- 27. Some users said they do not consider leases as *debt-like transactions* or that the current classification of leases in the statement of cash flows makes it hard for them to calculate some key metrics (such as free cash flows) for their analyses. Some users expressed concerns that the classification of payments for the principal portion of the lease liability as financing cash outflows does not align with the nature of business operations. These users view such payments as arising from operating activities and consider the current classification to be inconsistent with how entities manage and report their operating cash flows. Examples of reclassifications that users make include:

- (a) a credit rating agency said they reclassify lease-related cash flows from financing to operating activities for *all* leases and this information is not always readily available or easy to find in the financial statements.
- (b) another credit rating agency said they reclassify payments for the principal portion of the lease liability from financing to investing activities (treating it as deferred capital expenditure), and payments of interest to operating activities (unless the interest is already classified in operating activities).
- (c) a user from Asia-Oceania said they deduct lease expense from EBITDA in sectors where leases are core to an entity's operations. These sectors include retail, hospitals, clinics and pharmacies, and airlines.

28. Some users said analysing lease-related cash flows is *complex*, because they are classified in different categories in the statement of cash flows and in some cases the lease-related information is not sufficiently disaggregated. We note that the nature of some users' comments might indicate some non-compliance with some of the requirements of IFRS 16 or other IFRS Accounting Standards. Users' comments included:

- (a) the requirement to disclose information about total cash outflows for leases is inconsistently applied. A user from Asia-Oceania said this information is generally disclosed, but some entities exclude from this measure, for example, cash flows related to short-term leases or leases of low-value assets. So, in the user's view, the measure is sometimes incomplete. A user organisation from the same region said that if the total cash outflow for leases does not equal the sum of the principal and interest portions, users may need to perform additional analyses to understand the difference. A standard-setter said users in their jurisdiction have emphasised the importance of information about periodic cash outflows for leases.
- (b) in some cases, information about variable lease payments (excluded from the measurement of lease liability) is not separately presented in the statement of cash flows or disclosed in the notes, even if material.

- (c) many entities do not disclose changes in liabilities, including lease liabilities, arising from financing activities.
- (d) lease-related information necessary to calculate free cash flow is not necessarily disclosed in a single location, and the relationship between information provided in several notes is difficult to understand.
- (e) users would prefer all cash flows from leases to be classified as an operating activity, as it is simpler and more intuitive to understand.
- (f) current accounting overcomplicates what is essentially a straightforward cost of doing business.

29. Some users said to help them *compare lessees with entities that borrow to buy assets*, the IASB should require lessees to present:

- (a) non-cash movements on lease commencement date (that is, cash outflows in investing activities and offsetting cash inflows in financing activities). A user said non-cash transactions related to leases are only disclosed by some entities and generally it is difficult to find the relevant information to compare entities that lease assets with those that borrow to buy assets. Conversely, a credit rating agency said that in almost all cases they have sufficient information in the financial statements to make adjustments they need to compare both types of entities.
- (b) interest and principal payments separately within financing activities.

30. Some users commented on the *quality and availability of information* about lease related cash flows. They said the quality of reported information often does not enable them to understand differences between lease expenses presented in the income statement and lease-related cash flows presented in the statement of cash flows. A credit rating agency noted that in some cases the differences might be as large as 20%–30% and said the lack of information about such differences undermines the reliability of the cash flow information. See also users' concerns about the quality of information about total cash outflows in paragraph 28(a).

31. A few users (including a user organisation from Europe) who provided positive feedback explained that the information about lease-related cash flows is useful for their decision-making and noted that it is well disclosed by entities for which leases are significant. They highlighted several areas that present challenges to comparability and to their analyses and made suggestions on how to make the cash flows information even better. They suggested developing some targeted requirements for the lessees, for example:

- (a) to present, in the statement of cash flows, separately the cash payments for the principal portion and the cash payments for the interest portion of the lease liability;
- (b) to always classify lease interest payments in the same category of the statement of cash flows; and
- (c) to disclose information about cash inflows from lease incentives to provide a complete picture of lease-related cash flows.

Transition to IFRS 16

32. Many users commented on transition from IAS 17 to IFRS 16 and their overall feedback was generally positive. They said, despite most entities applying the modified retrospective approach (which is not a method preferred by users), they had information to understand the changes to the entities' financial performance, financial position and cash flows resulting from the implementation of IFRS 16. Users particularly found useful the requirement for lessees to reconcile lease liabilities recognised in accordance with IFRS 16 with operating lease commitments disclosed in prior year financial statements in accordance with IAS 17, which helped them to understand the reasons for any significant differences. However, a user organisation from Asia-Oceania said they observed some material differences, but entities provided no explanation.

33. A user organisation from Europe said that in periods before the effective date of the Standard, users found useful disclosure of the possible impact that application of

IFRS 16 would have on the lessees' financial statements in the period of initial application. Users said, in most cases, the actual amounts recognised on the balance sheet in the first year of the application were as they expected.

34. Users generally acknowledged that the implementation of IFRS 16 distorted trends, but they were able to find necessary information for adjusting models.
35. A few users said they found comparability between entities and between years challenging due to preparers using different transition methods and practical expedients.

Other comments

36. Some users raised broader concerns about the accounting for variable lease payments. Their comments included:
 - (a) a few users highlighted that in some sectors, particularly retail, variable lease payments that are not included in the measurement of lease liability are prevalent. In these users' view, the exclusion of some variable lease payments from the measurement of lease liabilities complicates comparability between entities with varying proportions of fixed and variable lease payments. One of these users said fixed payments are similar to debt and contribute to leverage, whereas variable payments do not share this characteristic, and from their perspective fixed lease payments are more important to their analyses than variable lease payments.
 - (b) a credit rating agency said the exclusion of some variable lease payments from the measurement of lease liability might incentivise entities to structure lease contracts to avoid recognition of (or to recognise a lower amount of) lease liabilities. The user said they observed trends in some ratios that might indicate growing prevalence of contracts with variable lease payments compared to the pre-IFRS 16 period. Conversely, another credit rating agency said variable

lease payments that are not included in the measurement of the lease liability do not complicate their analyses.

- (c) a user organisation from Europe said the diversity of variable lease payments affects comparability and their ability to assess the effect that leases have on the financial performance and cash flows of an entity.

37. Some users commented on sale and leaseback transactions. A few said these transactions are not prevalent, acknowledging that the partial gain or loss model makes them less attractive. One user said sale and leaseback transactions are common in the telecommunications sector and there seems to be structuring opportunities for entities. The user provided an example where an entity sold their mobile network towers and leased back the rights to use some of the space on the towers, treating the rights as service contracts.

38. A user organisation from Asia-Oceania suggested that the IASB should consider aligning the gain or loss recognition requirements for sale and leaseback transactions in IFRS 16 with the requirements in Topic 842.¹ In the user's view, the requirements in Topic 842 are easier to understand and apply than those in IFRS 16 and result in more consistent application.

39. Both credit rating agencies we spoke with agreed with the partial gain or loss recognition requirements conceptually. However, they said sale and leaseback transactions normally have little importance for their analyses, because: a) they reverse non-recurring items of income and expense when assessing entities' credit ratings; or b) the information about the related cash flows and the debt arising from a leaseback is more relevant to them. The two credit rating agencies did not raise any concerns about the quality of information about sale and leaseback transactions that entities provide.

¹ Topic 842 requires a seller-lessee to account for any gain or loss on sale consistently with the guidance that would apply to any other sale of an asset.

40. Only a few users commented on the application of IFRS 9 with IFRS 16 to rent concessions described in the RFI. One user said rent concessions were prevalent during the covid-19 pandemic. Another user suggested the IASB provide clarifications, but the user did not provide further details.
41. Other suggestions for targeted improvements to IFRS Accounting Standards by one or a few users included:
 - (a) to align the requirements in IFRS 9 and IFRS 15 *Revenue from Contracts with Customers* for variable consideration;
 - (b) to provide illustrative examples and guidance, and align the requirements in IAS 38 *Intangible Assets*, IFRS 15 and IFRS 16 for technology-related contracts, such as leases of software and cloud services;
 - (c) to develop detailed disclosure requirements for service contracts;
 - (d) to enhance the requirements for the maturity analysis of lease liabilities in IFRS 7 by requiring lessees to determine narrower time bands;
 - (e) to require a reconciliation of the carrying amount of right-of-use assets at the beginning and end of the reporting period, similar to the requirements in paragraph 73(e) of IAS 16 *Property, Plant and Equipment*; and
 - (f) to reconsider the requirement to present intragroup leases in separate financial statements applying IFRS 16, because, in a user organisation's view, the resulting information is not useful.

Question for the IASB

Question for the IASB

Do you have any comments or questions on the feedback summarised in this agenda paper?