

EFRAG
Mr. Wolf Klinz, chair of EFRAG FRB
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Our ref: RJ-EFRAG 638B
Direct dial: +31 (0)88 4960391
Date: Hoofddorp, 30 September 2025
Re: DASB response to EFRAG Draft comment letter PIR IFRS 16 Leases

Dear Mr Klinz,

The Dutch Accounting Standards Board (DASB) welcomes the opportunity to respond to the - questions in the - EFRAG draft comment letter on the IASB Request for Information in respect of the Post Implementation Review of IFRS 16 (PIR IFRS 16).

We appreciate the broad range of issues addressed in EFRAG's draft comment letter reflecting also the concerns raised in the IASB Request for Information document as well as our earlier comments (DASB reaction to IFRS 16 PIR survey, April 2024).

The DASB would urge the IASB to resolve apparent conflicts between accounting standards that lead to divergence in practice. Notably, the interaction of IFRS 16 with IFRS 9 and IFRS 15 need urgent attention and should, in our view, be prioritised over the other issues mentioned in your cover letter.

Generally, we concur with EFRAG's consideration that IFRS 16 is working well for (listed) companies, yet we observe areas for improvement or reconsideration, in particular the above mentioned interaction between standards. The DASB believes that for many of the application issues mentioned, common practice has developed over the years since the effective date. As such we question as to whether *all* the issues that EFRAG has identified in its draft comment letter are still causing problems in the consistent application of the IFRS 16 requirements by large (listed) entities. Specifically, we do not recognise the application issue of *distinction between lease and in-substance purchase of asset* that is mentioned in your cover letter, we suggest for it to be either clarified or removed. On balance, we would not consider a request for further application guidance to be helpful at this stage.

As standard setter, we do not have a full and comprehensive view on the initial and/or ongoing costs of the application of IFRS 16 as per your as well as per IASB's PIR request. Given these limitations, we have chosen to abstain from answering the questions in your draft comment letter in full.

Please feel free to contact us if you wish to discuss the contents of this letter.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Gerard van Santen', with a long horizontal flourish extending to the right.

Gerard van Santen
Chairman Dutch Accounting Standards Board

-/- Appendix: Q+A EFRAG draft Comment letter RFI IFRS 16 PIR

Appendix

Q+A EFRAG draft Comment letter RFI IFRS 16 PIR

Question to Constituents

- 17 Do you consider that the IASB should give priority to address any of the application issues outlined in Appendix 2? If so, please explain why the IASB should give such priority and your suggestion on how to address the issue.

As per our cover letter, the DASB believes that further guidance on application issues at this stage would not be helpful in practice. We would rather urge the IASB to focus on resolving apparent conflicts between standards as a result of different requirements in IFRS 16 versus other IFRS accounting standards, primarily IFRS 9 and IFRS 15.

Question to Constituents

- 50 Taking into account the high priority issues identified by EFRAG (see cover letter), do you consider that the IASB should give priority to address any of the application issues outlined in paragraphs 32 to 45 to improve the usefulness of the information received by users? If so, do you have any suggestion to address the issue?

As noted above, the DASB would prefer for the IASB to focus its standard setting efforts on repairing apparent conflicts between IFRS accounting standards.

Question to Constituents

- 64 Are the ongoing costs listed above manageable? If not, what would be additional improvements to IFRS 16 that would help mitigate the ongoing costs?
- 65 Are you aware of additional significant ongoing costs of applying the measurement requirements? If so, please describe and explain how you propose the IASB reduce these costs.

These questions relate to the cost of applying IFRS 16 and, as per our cover letter, cannot be answered from the DASB's perspective.

Question to Constituents

- 161 Do you have comments on issues outlined in Appendix 2? Are the issues properly described and are the potential solutions mentioned reasonable?

The DASB has no further comments on the description of the remaining issues and the proposals for possible solutions.