From: ukfrsperiodicreview **Subject:** FRED82 Comment

From: Colin Mills

Sent: 12 April 2023 12:15

To: ukfrsperiodicreview < ukfrsperiodicreview@frc.org.uk >

Subject: FRED82 Comment

Leases

As I see it changes are proposed on leases for two reasons:

- To align with IFRS; and
- Due to companies "artificially" structuring leases in such a way that they don't (quite) meet the current definition of being a finance lease.

I accept for larger companies overall proposals are probably needed. However, for small companies will be excessive effort to determine accounting entries and management/shareholders of smaller companies are used to thinking of "rent" as expense, not an item that is included as a fixed asset, with capital repayments and interest. Could there be an exemption for small companies not to capitalise genuine "operating" leases on their balance sheet?

Colin

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