A Banking Union for the Euro Area

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An incomplete financial architecture

- Single market, Single currency, nation-bound supervision/resolution/safety nets
- □ It worked fine for a while
 - Uniform interbank market, Increasing financial integration/diversified portfolios
- □ Then the crisis came:
 - Vicious spirals sovereign/bank/real-sector
 - Re-fragmentation
 - Impaired monetary policy transmission mechanism
 - Problems with cross-border resolution

In a crisis deposit rates reflect the perceived strength of the safety net 1/



Source: ECB, Bloomberg, and IMF staff calculations.

Notes: 1/ Average interest rate paid by MFIs on new deposits with agreed maturity up to 1 year. Available data for Greece in April 2012 are not plotted due to being far away of the rest of the sample (the avg. interest rate was 4.8 and the sovereign greek CDS spread was 8751 bps).





Source: Bloomberg and IMF staff calculations

Notes: 1/The sample includes all 31 banks in the 2010 EU-wide EBA stress test for which CDS data (end of month) were available in Bloomberg. Available data for Greece in 2012 are not plotted due to being far away of the rest of the sample (the CDS spreads of two greek bank spreads were 1990 bps and 2027 bps, and the sovereign greek CDS spread was 8711 bps as of May 2012).

NFC Lending Rates and ECB Policy Rate (1-5yr. maturity, up to €1 million)





Bank Cross-border claims in percent of reporting country's GDP









A banking union

□ Three essential elements

Single supervisor

- Single resolution authority/process
- Common safety nets (deposit insurance/fiscal backstops)

Main rationale

Common <u>safety nets</u> to weaken sovereign/bank/realsector spirals

Moral hazard with common backstops

 $\Box \longrightarrow \underline{\text{Common supervision}}$

Supervision needs resolution powers to be effective

Single resolution authority
Needs funding to operate effectively

Additional benefits

Reduced regulatory capture

□ Improved cross-border resolution

Level playing field / competition policy

Scope

- What banks should be covered?
 - SIFIs
 - Large banks in small countries
 - Correlated risks
 - Avoid regulatory arbitrage
 - \rightarrow All banks
- What countries?
 - Essential for eurozone
 - Open to other EU but issues with multiple CB, LOLR, currencies
 - Pegs first?

How to get there

Ideal sequencing

- Standardize national supervision/Equalize safety nets
- Pass necessary laws/Build common institutions
- Transfer powers
- But we are not in tranquil times
 - Short-cuts/Costs to be accepted
 - Yet, clear path and end game will help
- Constrained sequencing
 - Gradual take-over (priority banks)
 - ESM injections
 - Multinational teams

Risks and problem issues

- □ Stalled or incomplete reforms
 - Poor design may be worse than status quo
 - Incentive compatibility

Governance

- Within ECB (functions)
- Between ECB and national regulators

Changes in financial structure

- TBTF
- Cross-border imbalances

A concern about macroprudential policy

□ How many agencies in charge of MaP/MiP?

- Is it conceivable to keep macroprudential and microprudential regulators separate?
- MaP could set level of certain ratios over the cycle
- MiP enforcement and bank level variations

Yet, things are more multidimensional and there can be conflicts

- Set P(X)=probability that bank X fails
- Then probability of joint failures: $P(X \cap Y) = P(Y \mid X)P(X) = P(X \mid Y)P(Y)$
- So you could have measures that lower P(X), P(Y), but increase $P(X \cap Y)$
- Think about completely separated versus integrated systems (Allen/Gale)
 - Hedging across banks/Cross-border links
 - What kind of strategic game can emerge between MiP and MaP agencies?

Cross-border issues with MaP

□ Macroprudential policy with open k-accounts?

- Cyclical CARs vs Basel I
- Borrower or activity based measures
- Risk of circumvention
- Especially an issues within currency areas

□ Need for greater coordination of MaP

ESM direct recapitalization

- Risk sharing mechanism (could eliminate tail risks for sovereigns)
- Not a loss sharing mechanism
- "Legacy assets": expected losses borne by sovereign
- Operational framework: access, governance, accountability, instruments



Establishing SSM: challenges

Crisis resolution:

Bank restructuring: national authorities may be ill equipped

□ Implementation:

- ECB reputation: slippages before actual power transfer
- Ensure incentive compatibility within the SSM, for information sharing and cooperation
- ECB must be able to intervene in a timely manner in any bank as deemed necessary
- Non-euro area countries: ensure attractive opt-ins



Single Resolution Mechanism

- Supra-national centralized resolution authority for all SSM banks
 - Effective decision-making, with common backstops
- □ Mandate and powers:
 - Early intervention and least cost resolution
 - In line with "FSB Key Attributes".
- Resolution tools/powers
- □ Systemic risk exception?



Burden sharing and backstops

Backstops and safety net:

- Common resolution fund
- ESM recapitalization
- Earmarked contingent euro-area taxation (for systemic events)
- ECB line of credit (with guarantees)

Lender of Last Resort centralized at the ECB

