CAPITAL REQUIREMENTS AND MACROECO-NOMIC STABILITY IN LIGHT OF MONETARY TIGHTENING

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DISCUSSION

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disclaimer: any views presented are my own and not necessarily those of the Bank of Canada

WHAT IS THE PAPER ABOUT

- very timely analysis!
- capital regulation helps to keep banks healthy
- then MP can focus on doing its job of targeting inflation!
- paper identify another reason to build up capital buffers ⇒ possibility of cost push shocks!

DSGE ANALYSIS COMPLEMENTING STRESS TESTS

- shows how DSGE models can inform macroprudential policy
- they provide exactly what is missing in stress tests

 \Rightarrow cost vs. benefit analysis over financial cycle

- of course, DSGE lack granularity and detail of stress tests
- but they capture dynamics over time in a consistent way
- complement stress tests to reduce blind spots
- examples
 - MartinezMiera-Repullo (2017) on "private credit"
 - this paper about cost-push shocks



WHAT EXACTLY IS THE CHANNEL

very rich model, what exactly is effect of MP on banks?

■ two conflicting forces:

- 1. MP tightening increases banks' margins
 - see current record profits of big banks
 - leading to "windfall" taxes in many jurisdictions
- 2. output gaps lead to loan losses

MP needs to balance those when banks are not doing well

what about borrower health?

- MP tightening may lead to financial stress when debt is high
- "financial dominance" as in Boissay-Borio-Leonte-Shim (2023)
- how relevant for bank loans?
 - banks are good at granting forbearance (avoid costly defaults)
- maybe this is more about non-bank credit (eg, bonds)?

paper could relate more to the literature on these issues

CLARIFY POLICY IMPLICATIONS

- should we have separate buffer to provsion for MP actions?
 - do we need a "systemic MP buffer" for GSIBs?
- or higher CCyB top of range/ neutral level?
- timing:
 - tighten cap req when financial stress materializes
 - ▶ in case MP must tighten...
 - OK, but wouldn't we like to loosen then?
 - to avoid procyclical capital requirements
 - need to clarify interaction with other buffers
- given role of interaction with indebtedness:
 - is a buffer to build resilience the right tool?
 - maybe borrower-based measures are more targeted

MAKE MODEL MORE DIRECTLY APPLICABLE TO POLICY

calibration/estimation without financial cycle moments

- 15 pre-set parameters
- 13 calibrated parameters (long-run averages)
 - eg, calibration target for average bank default rate
- 26 estimated parameters (business cycles moments)
- can we make this more macroprudential?
 - matters how bank default rates change over financial cycle
 - and even that might not reflect financial stress (TBTF)

eg, target fraction of years with high credit spreads

- worthwhile because model has huge potential for policy
 - even rich DSGE still simpler than regulators' "internal models"
 - for example, great complement to stress testing
- transparency is key in communicating macropru to markets
 - can rely on market prices as indicators during financial stress
 - eg, banks' market capitalization and credit spreads

- take seriously interaction of MP and macroprudential
- use a well-known class of DSGE policy models to evaluate
- find that macroprudential can create room for MP to act
- a very relevant result
 - not only today but also during financial cycles in general
- can further sharpen calibration and results!