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Macroprudential policy, countercyclical
bank capital buffers and credit supply:
Evidence from the Spanish Dynamic
Provisioning Experiment

Discussion by
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- Paper in a nutshell

- Study effect of “countercyclical” provisioning “experiment” in Spain
 - Policy experiment uses a calibrated function that maps current loan provisions (LP) into the additionally required countercyclical (i.e., not loan-specific), provisions
 - Calibrated parameters under control of central bank
 - The three policy shocks affecting banks differently
 - Policy shocks “interact” with “state of the economy”
 - Follow same bank-loan and bank-firm pairs!



- In good times

- Tightening provisioning requirements (PR)

- Makes banks that need to provision more make deeper cuts in credit commitments (to the same firm)(1stdev LP => -4% credit)
 - Firms manage to replace cuts in credit by going more to banks that are hit less
 - No enduring real effects (assets, staff, survival)

- Loosening PR :

- Response consistent with tightening/good times experience

- Results hold for credit commitments, to the same firm; on intensive and extensive margin.



- In bad times (2008, Q4)
 - Lowering the *minimum* PR:
 - Banks with LP close to the minimum (in lowest quartile), permanently cut credit (9%)
less
 - Banks with ample provisions permanently cut credit less (1stdev drop in PR => 5% increase in credit)
 - Substitution of credit more difficult than in good times
 - Real effects: assets, employment and survival increase at firms served by these banks
 - Results hold for intensive and extensive margin, but shorten maturity and increase collateral



- Picking up the last breadcrumbs
 - The workings of the experiment
 - A few regression questions
 - What we can learn from the paper
 - Some reflections on CCCB policies after reading JOPS
 - Parallel to asymmetric effect of monetary policy



▪ Reading the paper

- There's a lot! A Kashyap-Stein (2000) density experience
- The description of the experiment could provide more detail
 - Announcement time, did BdE make a policy statement about what it wanted to achieve, did all banks meet the provisioning demands?
- What's the relevant control group for banks?
- Firm-level measure of susceptibility to shocks: alternatives?
- Why can't you compute the size of the 2nd provisioning shock?
 - Can provide more intuition for the instrumenting? What are you disregarding and what are you instead focusing on?
- Could effect of DP depend on size because of access to equity market?
 - Regressions by size (now models are nested, interaction size*DP in Table 3)
- Some small text errors



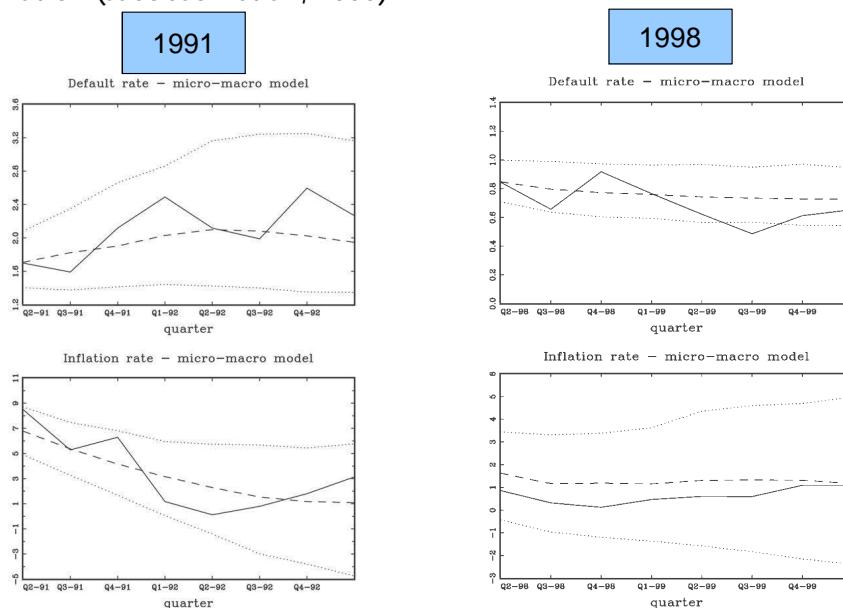
- What the paper made me think about ...
 - There are good things:
 - You can impose additional capital requirements in good times without hurting the economy
 - CCCB can make credit move from weaker to stronger institutions
 - Releasing DP (lowering capital requirements) in bad times can stimulate credit and the real economy
 - There are possibly bad things
 - Credit may (relatively) keep increasing in weak financial institutions
 - What is the true or relevant counterfactual for policymakers?
 - Spanish banks did not fare well post 2008 Q4, despite CCCB
 - What if bank is not exposed to policy? (Some banks in Spain)
 - Should we be concerned that simple rules create incentives to



- What the paper made me think about ...
 - What's complicated about CCCB:
 - Calibration of the CCCB function
 - Individual or system-wide addition?
 - Timing: when to build up and when to release?
 - Do we want badly provisioned (capitalized) banks to lend "more"?
 - What happened to the banks that benefited most in 2008-Q4?
 - Policymakers (BIS, ECB) have argued that increases in capital requirements don't have real effects: JOPS suggests true if introduced at right time (cf. BoE)
 - Parallel to asymmetric effect of monetary policy

- Parallel to asymmetric effects of monetary policy?

- Monetary contractions have asymmetric, state-dependent, effects on financial stability, not on inflation (Jacobson et al., 2005)





- Thanks!