

Robustness, validity and significance of the ECB's asset quality review and stress test exercise





Political environment in 2014

Challenges & Shortcomings

Stress-testing the European banking system



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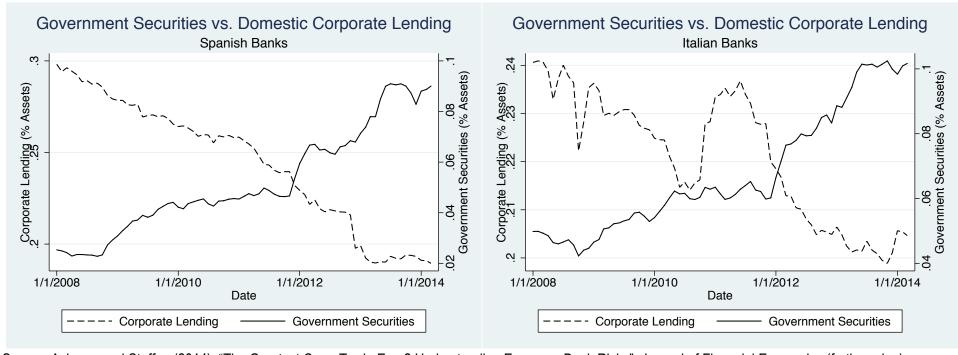


The political situation is now different compared to 2010 & 2011, requiring a thorough cleanup of bank' balance sheets

- The political situation is different compared to 2010 and 2011.
 - European Central Bank (ECB) needs to establish reputation as regulator & maintain reputation as central bank.
- Problem banks have not been uniformly dealt with in the Eurozone by national competent authorities (NCA), and...
- ...ECB's unconventional monetary policy measures made is possible to delay dealing with troubled banks (SMP, LTRO, OMT).
- Europe and the southern periphery have been mired in recession from early 2011 onwards.



Crowding-out of corporate lending in the Eurozone periphery



Source: Acharya and Steffen (2014), "The Greatest Carry Trade Ever? Understanding Eurozone Bank Risks", Journal of Financial Economics (forthcoming).

- The lack of capital prevents a cleaning-up of European banks' balance sheets.
 - This in turn prevents an efficient allocation of credit throughout the economy.



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The comprehensive assessment shows possible weaknesses both in the AQR and stress test

Asset Quality Review

- Identification and valuation of problem assets
- "Join up"

Stress Test

- Design of stress tests
 - Severity and consistency of stress test scenarios
 - Horizon and static balance sheet assumption
 - Liquidity risk not modeled
 - Bottom-up approach



The comprehensive assessment shows possible weaknesses both in the AQR and stress test (cont'd)

Stress Test (cont'd)

- Macro-perspective is missing (systemic risk and feedback effects)
 - Contractual contagion or domino contagion
 - Information contagion
 - Fire-sale externalities
 - Price complexity contagion
 - Common Exposures
- Evaluation
 - Use of regulatory capital ratio as single benchmark
 - Recapitalization still unclear



Implications for stress testing

- Assessing linkages between banks is important for monitoring financial stability
- Develop empirical measures of asset commonality to quantify the extent of portfolio overlap.
- Risks might still be hidden even if common exposures are identified (e.g. Thai crisis).
- Financial system comprises shadow banks, insurance companies, etc. which should be part of a stress testing exercise.
- Model possible feedback effects from the banking sector to the real sector (and vice-versa).



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Alternative macroprudential stress tests using market data

- Benchmarks models to evaluate the outcomes of regulatory assessments.
- Different approaches
 - Rely on historical episodes
 - Use the tails of the distribution of specific risk factors
 - Stressed capital ratios
- Advantages
 - Macroprudential objective
 - Incorporate systemic risk



Our calculations estimate that shortfalls can exceed 400 billion euros only for publicly listed banks

Capital shortfalls of 40 public stress test banks in million euros.

Country	Equity/ Assets 4%	Equity/ Assets 7%	Market Equity Assets 4%	/ Market Equity/ Assets 7%	SRISK 5.50%
 Total	29,883	238,044	118,435	411,814	453,724

- Capital shortfalls estimated using regulatory capital ratios are uncorrelated with shortfalls calculated under book and/or market capital ratios.
- ➤ ECB/EBA estimates (relying on a regulatory capital ratio) might thus be very different from our estimates.



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The objective of the comprehensive assessment might be challenged

- ECB has a keen interest to clean up the balance sheets of European largest banks.
- But substantial weaknesses with AQR and stress test remain.
- There are two aspects that may affect its incentives.
 - Who is going to pay if shortfalls are identified?
 - There are diverging interests between the ECB and national regulators
- Concerns about the validity of the comprehensive assessment has possible effects on capital and short-term funding markets.
- Objective benchmark models are a useful exercise unaffected by political interests.



Thank you!



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