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EUROSYSTEM

# Is Bigger Really Better? Moral Hazard Issues in Expanding Financial Safety Nets

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## Structure

Global financial governance since the Global Financial Crisis (GFC)

Need to rethink the international Lender of Last Resort (LOLR)?

Moral Hazard aspects of central bank swap lines

Policy implications

## Global financial governance since the GFC

- The GFC did not occasion an abrupt, radical shift from one regime of global financial governance to another, but **innovations in global financial governance**
  - Rather than a fundamental strengthening of global arrangements, we see an erosion of multilateralism, the emergence of “**plurilateralisation**’ of global financial governance (Eichengreen 2018), i.e. the diffusion of bilateral (swap lines), regional (e.g. CMIM, FLAR, ESM) and global governance arrangements
- The post-crisis regulatory reform agenda has made the **banking system more resilient**
  - Some claim that the global financial landscape is still built around **too-big-to fail institutions**, rising shadow bank activities, including connections to banks, etc.
  - There is still scope for efforts to prevent **regulatory arbitrage** at the world-wide level

## Global financial governance since the GFC

### Reasons behind the additional plurilateral layers

- To better manage cross-border financial sector and monetary spillovers as well as capital account vulnerabilities
  - Trilemma may have morphed into a dilemma
- Under-represented countries wish to enhance ownership in global financial governance
  - Alternatives to the IMF-centered global financial architecture
- Advancing longer-term strategic objectives
  - E.g. China's network of bilateral swaps to promote the internationalization of the renminbi
- To reduce the need to accumulate foreign exchange reserves
  - Adverse impact on global macroeconomic outcome can be mitigated

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## Need to rethink the international LOLR?

- Expansion of GFSN should **reduce demand for foreign currency reserves**
  - Potential benefits: e.g. reduction of mismatch of supply of and demand for foreign currency reserves
- **US dollar exchange rate** has taken on the role of a **barometer of risk appetite**
  - Changes in its value have significant consequences for the global economy far beyond the traditional direct effects on external trade
  - Risk of a dollar funding squeeze – “exorbitant duty” of the key currency issuer(s)?
- **Shortcomings** of the current **plurilateral layers of the GFSN** (EPG 2018)
  - Uneven in scale and coverage across regions
  - Lack of necessary coordination has resulted in fragmentation
  - Most elements are costly – either financially (reserves) or politically (due to stigma)

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## Moral hazard aspects of central bank swap lines

- During the GFC central bank **currency swaps** have played a **critical role** in **easing funding pressures** on European and other foreign banks, limiting the need for fire sales of assets
- Central bank **swap arrangements** address the **lack of a (fast and flexible) international LOLR** arrangements for banks borrowing in key currencies
- The **volume of swap operations** and the wide range of countries involved was **unprecedented**, but the network remains **uneven**:
  - While central bank swap lines between reserve currencies and some emerging market countries were allowed to expire,
  - in 2013 six central banks (BoC, BoE, BoJ, ECB, FED, SNB) converted their existing temporary bilateral liquidity swap lines to standing arrangements



# Moral hazard aspects of central bank swap lines

## The (old) grand dilemma

- By **rejecting liquidity provision** to illiquid (but otherwise solvent) financial institutions during a **liquidity crisis**, the latter may transcend into a **solvency crisis**
- But **providing liquidity** protects the **creditors** and **shareholders** of (large) **financial institutions and investors**
  - The anticipation of this support may **invite financial market participants to set off new adventures**, eliciting ever-more support, in particular
    - the financial sectors of insured countries may be more inclined to rely too much on unhedged foreign currency financing
    - danger of foreign currency lending booms, currency mismatches on the balance sheets of households and firms
    - **implicit subsidies of Too Big To Fail Banks of insured countries may be strengthened**

## Moral hazard aspects of central bank swap lines

Efforts to reduce the implicit subsidies of too big to fail banks

- Higher capital and leverage ratios for large banks
- *regulator's paradox: large complex and interconnected banks need very little capital in the good times, but they can never have enough in an extreme crisis.* Blundell-Wignall et al. (2014)

# Moral hazard aspects of central bank swap lines

## Efforts to reduce the implicit subsidies of too big to fail banks

- New resolution and restructuring frameworks for large banks, including bail-in
  - Total loss-absorbing capacity (TLAC) bonds can be bailed in (converted into equity or written down) in the event of resolution
  - In the EU, bail-in of at least 8% of an institution's total liabilities is required before government stabilization tools or resolution financing can be made available
  - It is unclear whether resolution and bail-in work in a systemic crisis where large banks need to be resolved
  - Investors in bail-in instruments need to be storm-resilient! Otherwise bail-in of bank liabilities may trigger runs on essential bank liabilities.

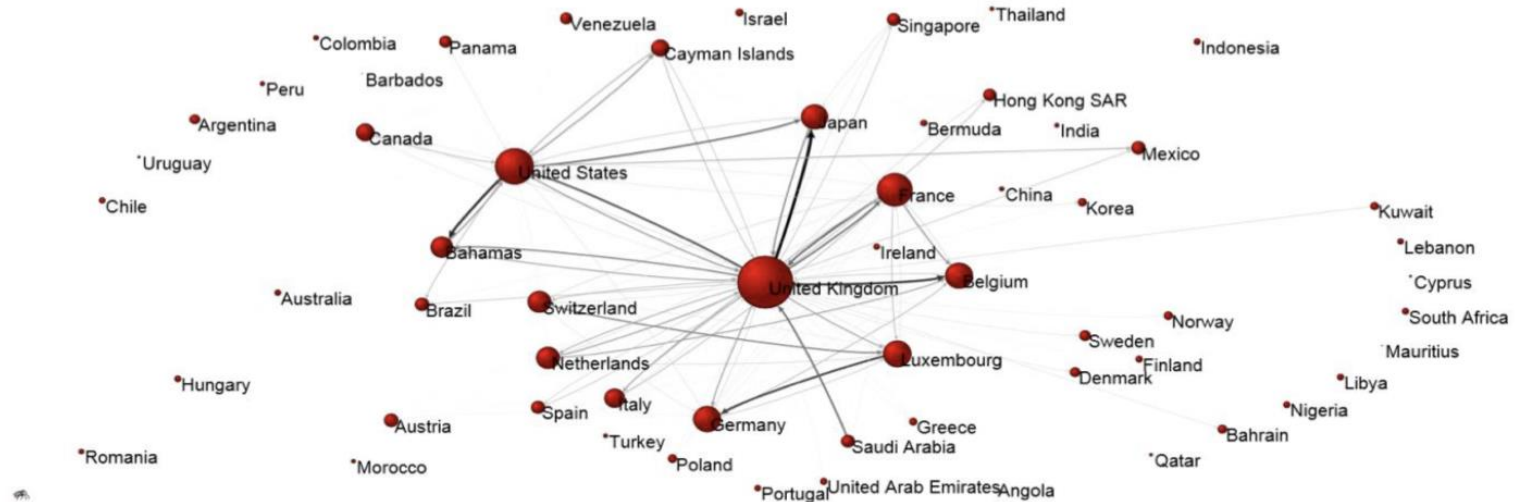
## Moral hazard aspects of central bank swap lines

### The role of (large) banks one decade after the GFC

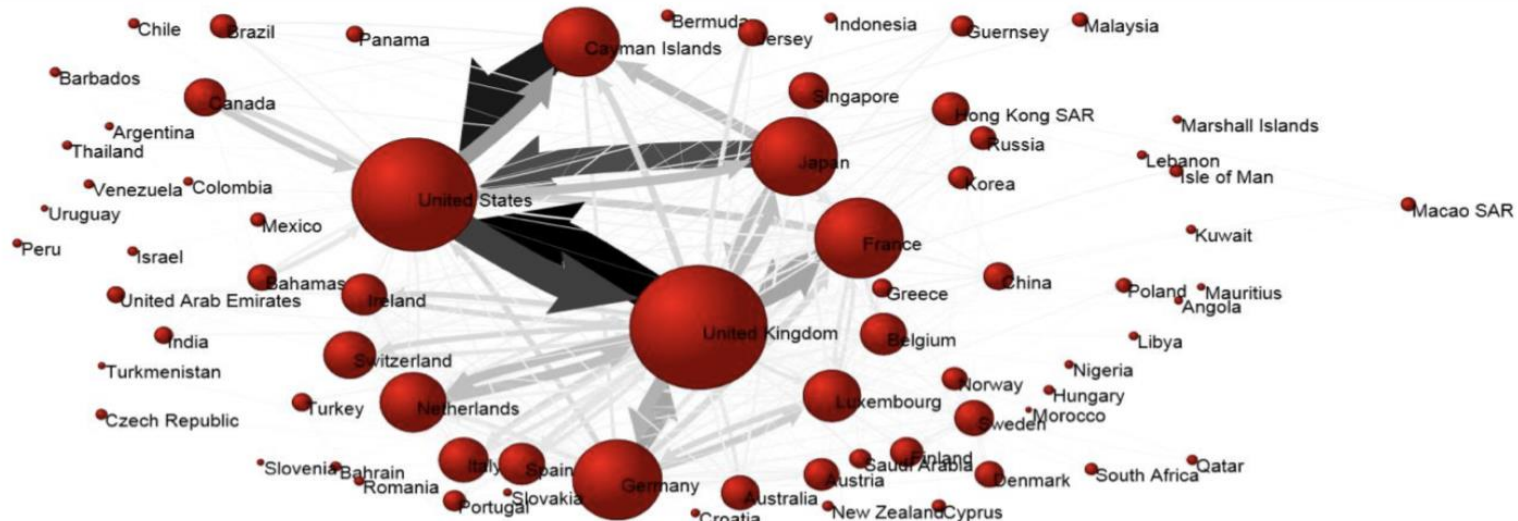
- No signs of general financial deglobalization in banking since the GFC
- Foreign bank's dollar liabilities are of similar size to 2007-08
  - Non-European banks expanded their dollar borrowing quite rapidly, but European banks have shrunk their dollar business and the role of the US affiliates since the GFC (BIS 2018)
  - Euro area banks' reliance on US dollar funding is limited in aggregate (around 10% of total funding), it is quite sizeable for some global systemically important banks (G-SIBs) (up to 29%) (ECB 2018). More than two thirds of the US dollar funding is wholesale
- The size of large banks has on average not shrunk
  - The size of the bank network links in key advanced economies has strongly increased (IMF 2016)
  - China's largest banks, having overtaken euro area banks, have become the world's largest banks by assets

# Banking Integration, 1980 and 2013

1980



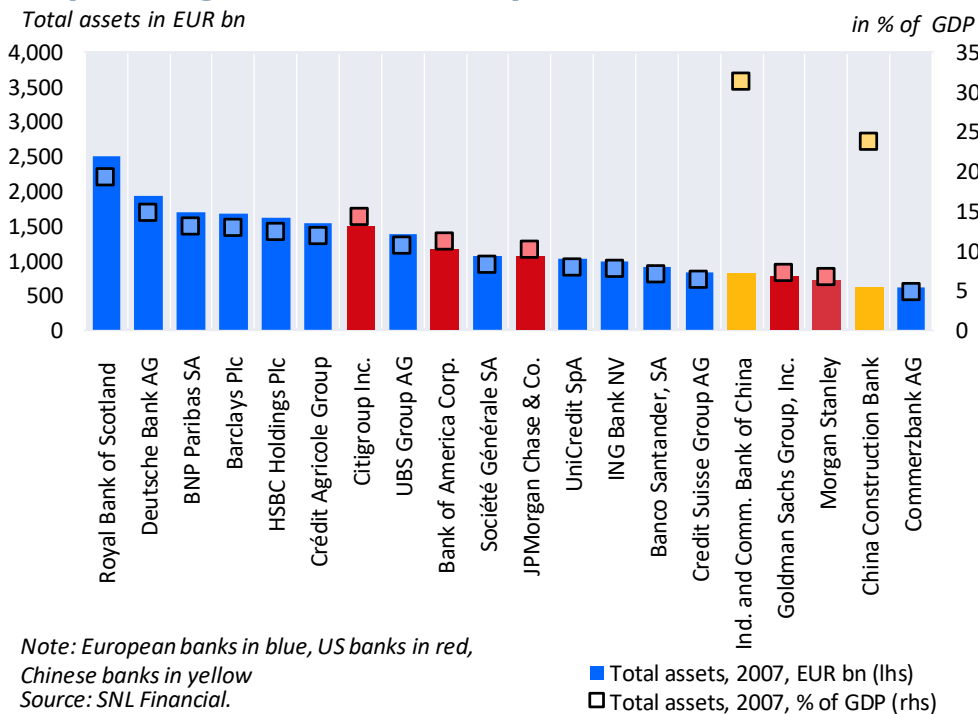
2013



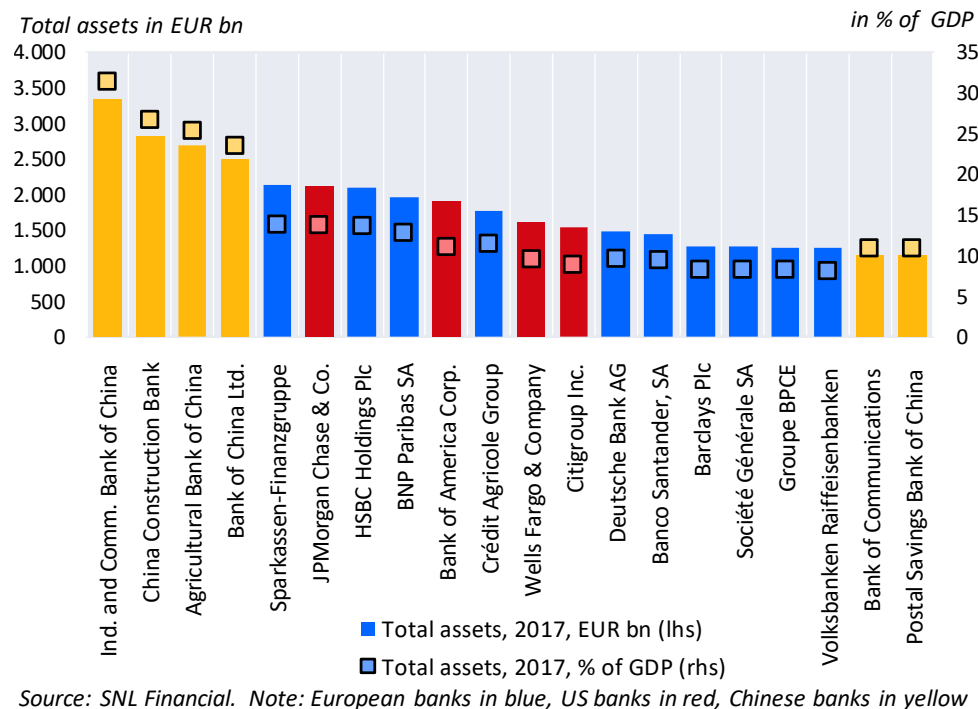
Source: IMF 2016

# Top 20 largest banks in Europe, USA and China, 2007 and 2017

## Top 20 largest banks in Europe, USA and China, 2007



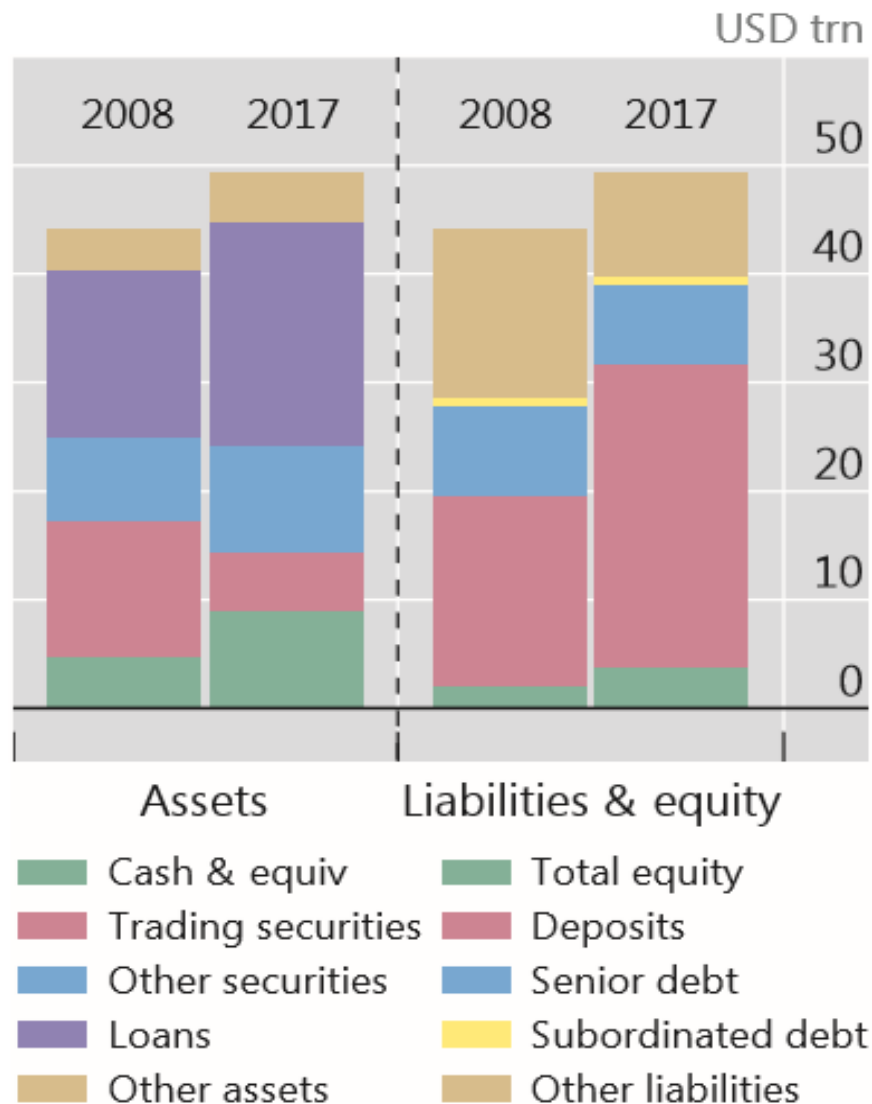
## Top 20 largest banks in Europe, USA and China, 2017



Blue: EU  
Red: US  
Yellow: CN

# Moral hazard aspects of central bank swap lines

## G-SIB balance sheets (BIS 2018)



- More and higher-quality capital;
- less reliance on short-term wholesale funding;
- bigger high-quality liquid asset (HQLA) buffers; and
- a shift away from business lines such as proprietary trading, apparent from the shedding of trading assets.
- this reflects a broader shift towards more retail-oriented business models, with relatively stable funding and income sources.

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## Policy implications

- Making the global financial system more resilient by **strengthening the GFSN** is important,
- but in parallel, further efforts should be undertaken to lower the risks that the use of **GFSN is needed**, also by addressing moral hazard implications
  - Better regulation and management of capital flows and macroprudential measures, monitoring of ‘international funding risks’
  - Private sector liquidity support (i.e. Vienna Initiative)
  - Global financial regulation, including coordination of regulatory measures between source and recipient countries
  - Further addressing the problem of banks too big to fail
  - Regulation of shadow banks, advance with closing data gaps, improved monitoring (derivatives, etc.)



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**Thank you for your attention!**

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