# Macroprudential Policy Making in Practice: The Swiss Experience

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**PSE** and **CEPR** 

LSE - March 6, 2017

#### Switzerland

- SOE with a safe haven currency: the key element of context is not within our control
- Financial stability risks are exclusively home-made
  - External capital flows present an ER and MP challenge little interaction with financial stability issues
- Two financial stability issues
  - A bubbly real estate market
  - Two SIBs, very large relative to the economy

#### Roadmap

- Elements of context: the safe haven challenge
- The housing market situation and its perception: a bubble? Or 'Here and now', it is different?
- The institutional set-up and the 2012-15 policy response
- A dynamics under control?
- The design of the CCB
- Issue #2: UBS & CS

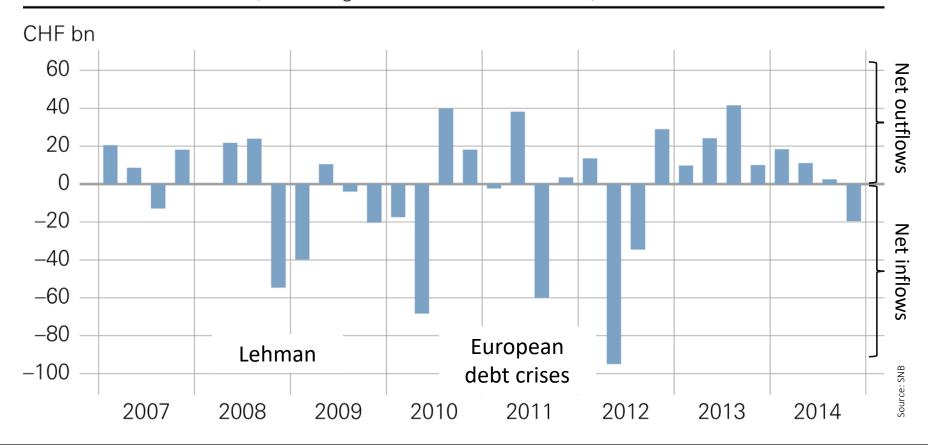
# The corollary of a safe haven currency



# Financial crisis: safe haven induced net inflows of private capital

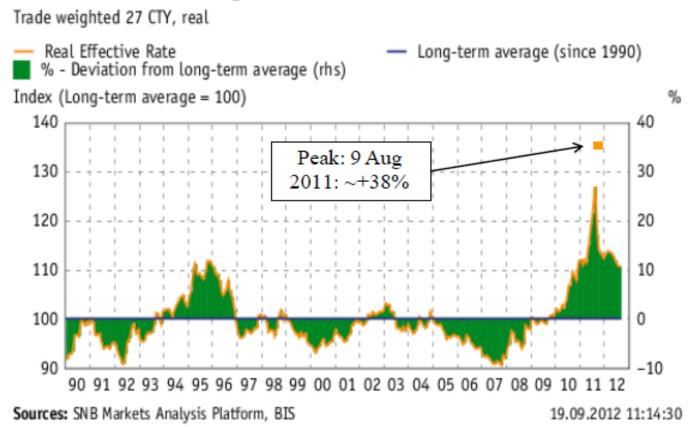
SWITZERLAND: PRIVATE CAPITAL FLOWS, NET

Swiss financial account (excluding reserves and derivatives)



# Leaning against the wind? An impossible dream

#### CHF effective exchange rate



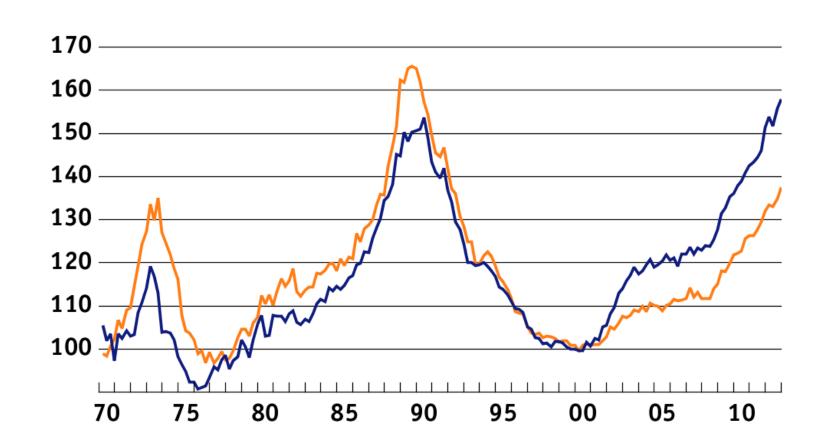
#### Roadmap

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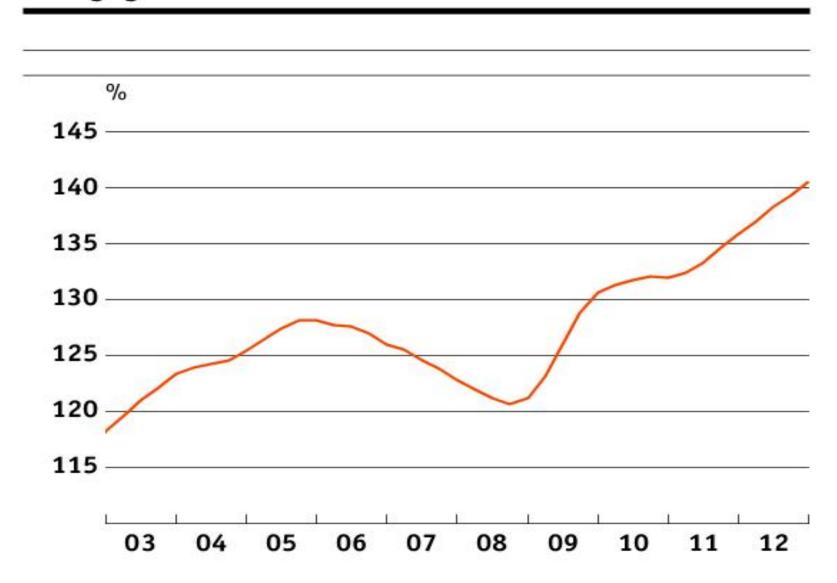
#### **Swiss real estate price indices**

Asking prices (Q1/2000 = 100)

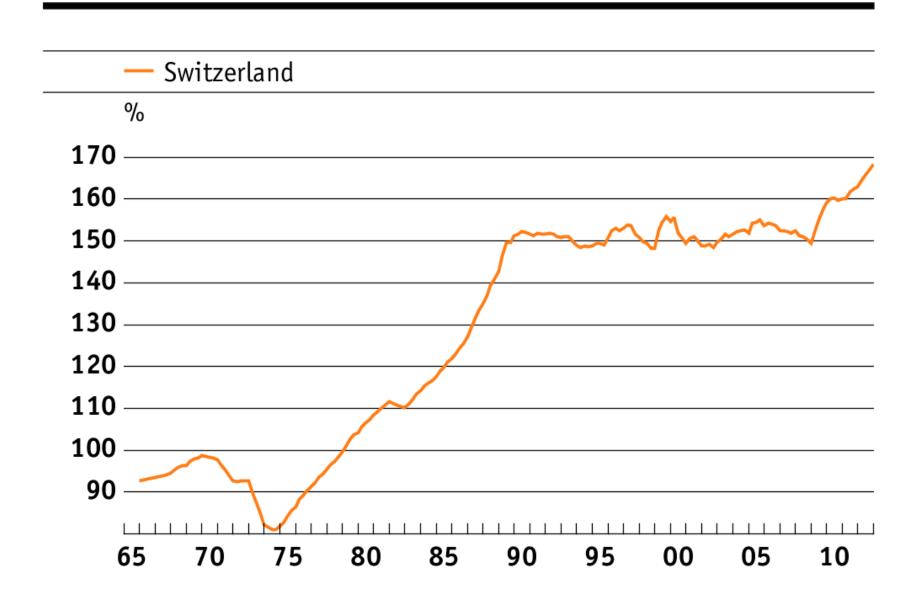
— single-family houses — Owner-occupied apartments



#### Mortgages-to-GDP



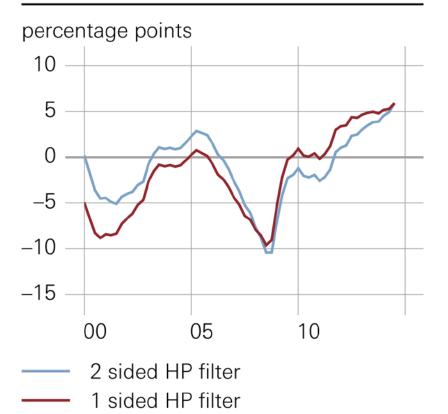
#### **Domestic credit-to-GDP**



# Assessment: Significant imbalances according to standard indicators

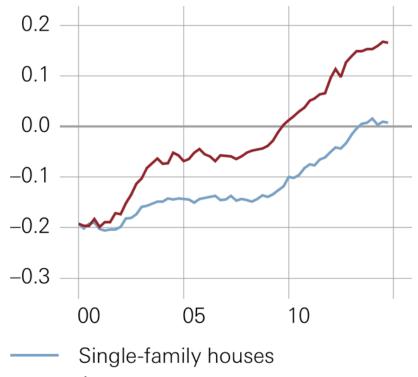
MORTGAGES-TO-GDP: GAP

BIS reference indicator



PRICE-TO-RENT: ASKING PRICES

Deviation from long term average



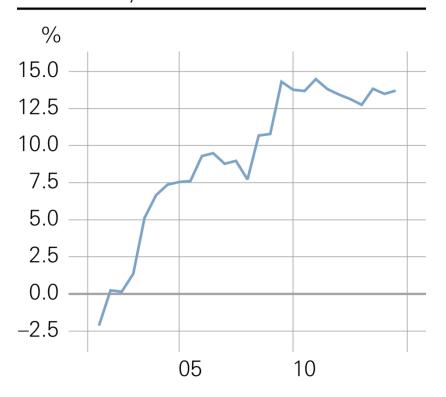
Apartments

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# ...and high risk appetite by lenders

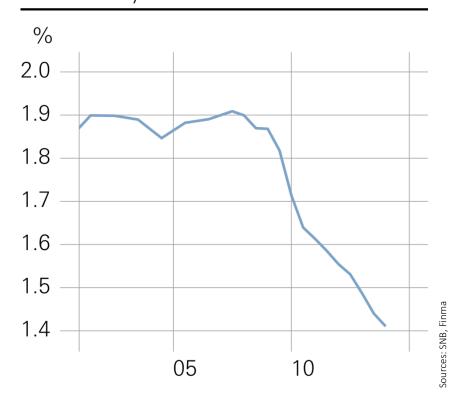
#### INTEREST RATE RISK

NPV losses relative to capital for +200bp, domestically oriented banks



#### INTEREST RATE MARGIN

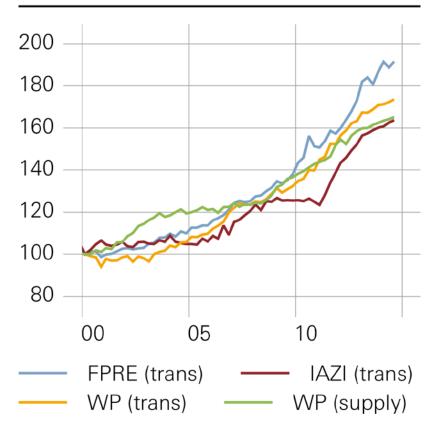
Weighted average, semi-annual data, domestically oriented banks



#### But is it a bubble?

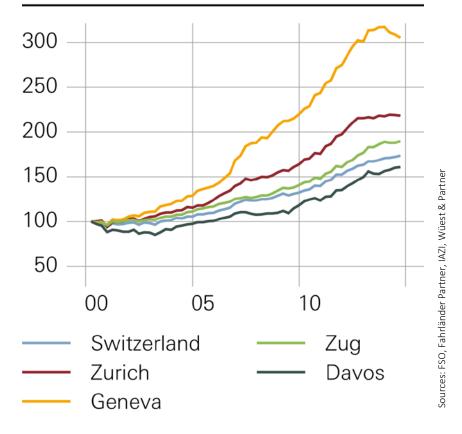
#### **APARTMENT PRICE INDICES**

In real terms, Q1/2000 = 100



#### **REGIONAL HOTSPOTS**

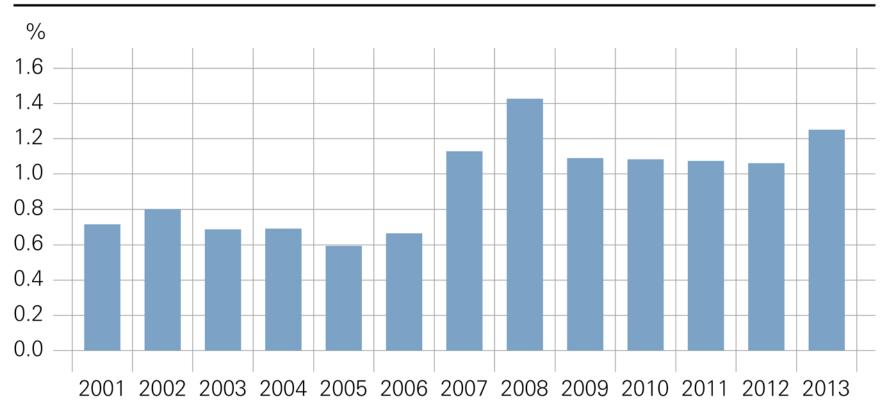
Apartments: real transaction prices



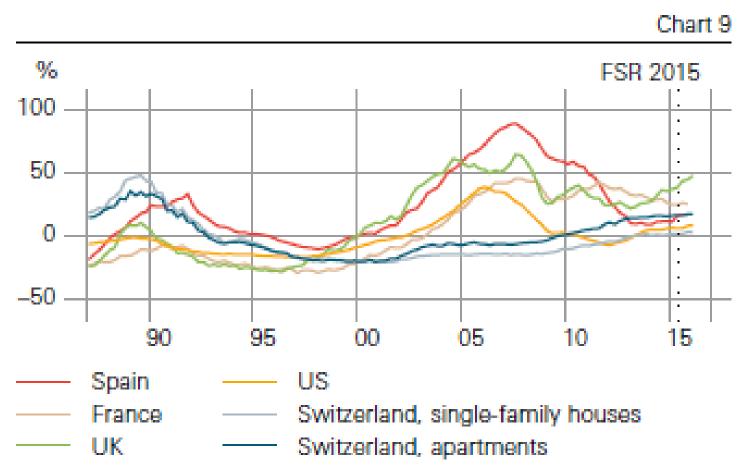
# ...strong housing demand...

#### **POPULATION GROWTH**

annual change



#### PRICE-TO-RENT RATIO: DEVIATION FROM LONG-TERM AVERAGE



The average is calculated over the period from 1970 to 2015, or over the period for which data are available. For Switzerland, asking prices are used.

Sources: BIS, OECD, SFSO, Thomson Reuters Datastream, Wüest & Partner

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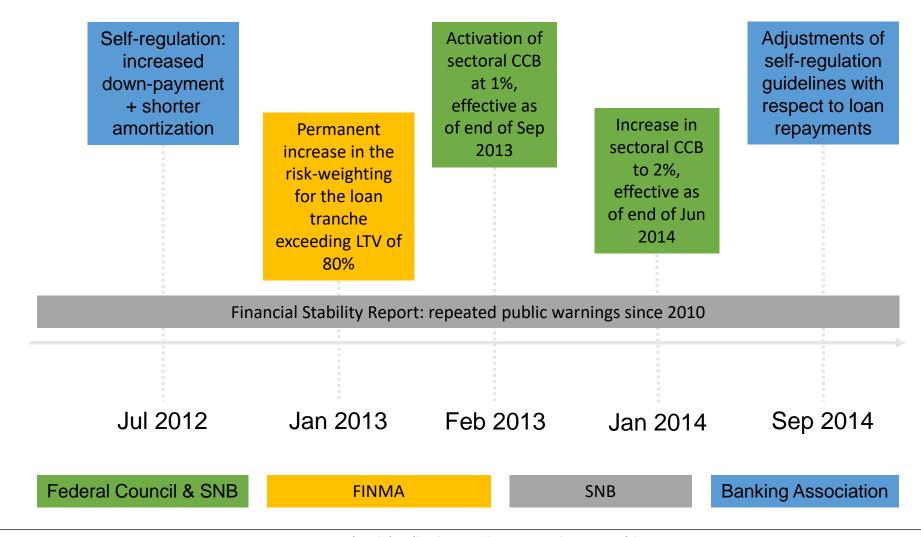
# Institutional set-up

- No single macroprudential authority or Financial Stability Board
  - Division of responsibilities
  - Central bank (SNB) the only institution with an explicit financial stability mandate ("contribute")
- SNB's instruments
  - Communication/moral suasion
  - Crisis management liquidity support
  - Regulatory framework: input/expertise, but no formal mandate
  - NEW: CCB: formal responsibility, but no decision taking power

# Division of responsibilities – the CCB

- SNB proposes activation, modification and deactivation of the CCB
- Federal Council decides upon SNB proposition after consultation of the financial market supervisory authority
- Procedure
  - The SNB conducts a quarterly assessment of the developments in the mortgage and real estate markets
  - If the SNB determines that it is necessary to activate or adjust the level of the buffer, the SNB submits an official proposal to the Federal Council
  - FINMA supervises the implementation of the CCB at individual bank level

### A pragmatic multipronged approach



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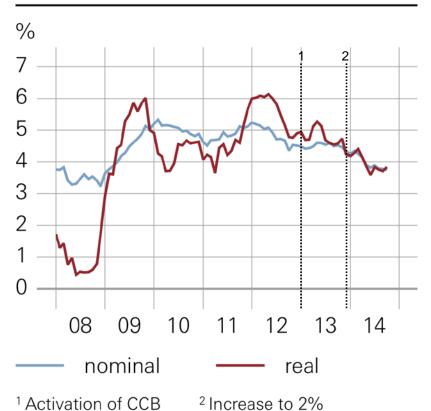
# Effectiveness – the evidence (I)

- Activation and increase of CCB: Banks responded by increasing capital, making them more resilient
- Difficult to assess whether mortgage lending is directly affected
  - No counterfactual
  - Impact of individual measures cannot be assessed
    - CCB: may impact lending depends on size/design
    - Self-regulation: down-payment rule likely to impact demand for housing

# Effectiveness – the evidence (II)

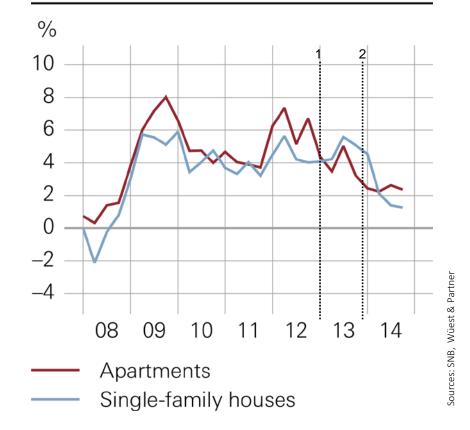
#### MORTGAGE GROWTH

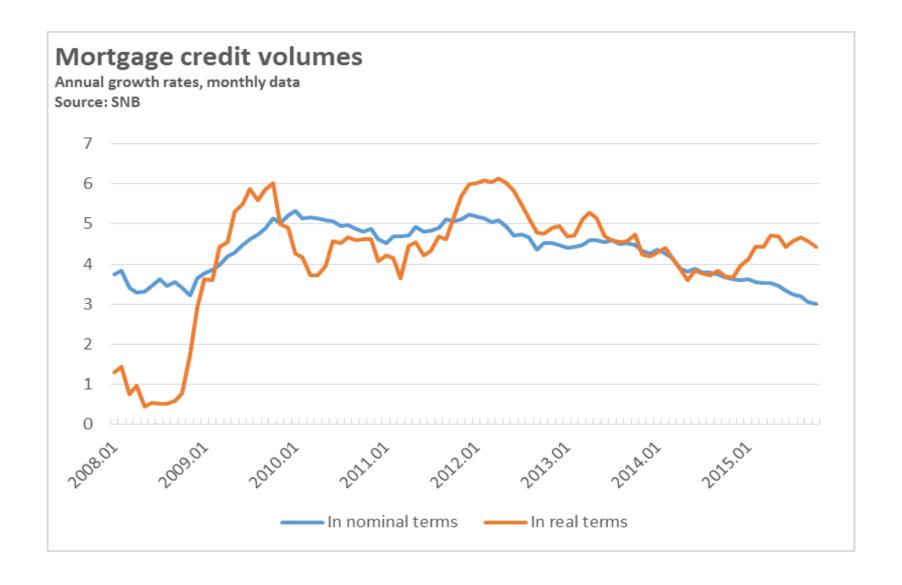
Annual growth rate, monthly data

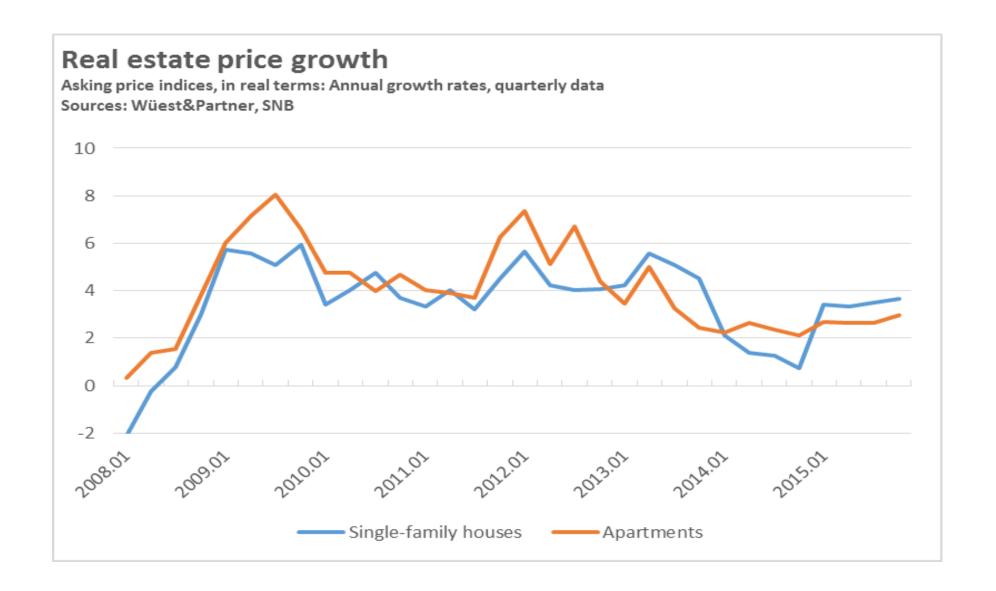


#### **REAL ESTATE PRICE GROWTH**

asking price indices, real annual rates





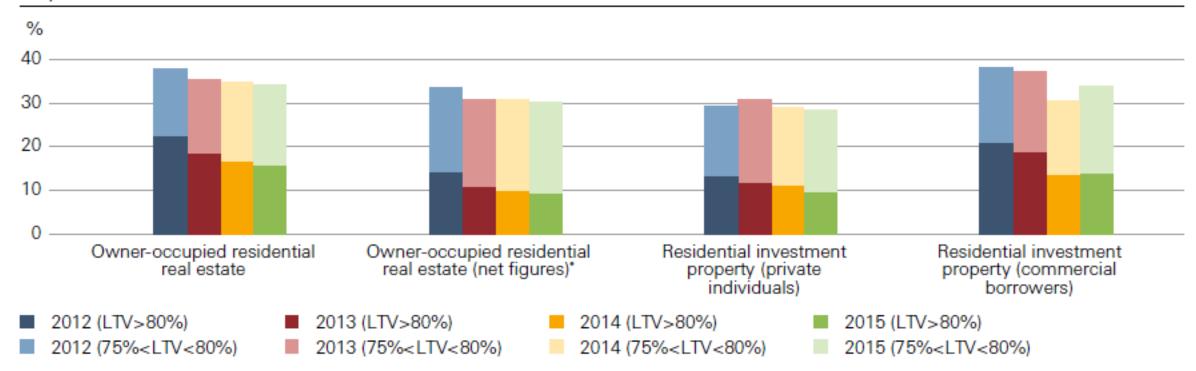




#### LOAN-TO-VALUE: NEW MORTGAGES

Proportion of new loans with LTV over 80% and between 75% and 80%

Chart 14



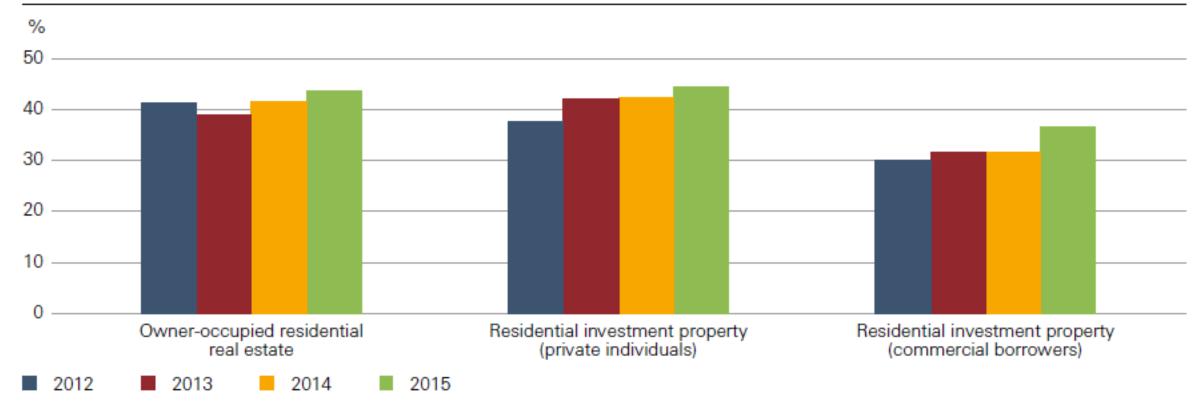
<sup>\*</sup> When calculating net figures, pledges from pillar 2 and 3a pension funds used as part of the scheme to encourage home ownership are counted as additional collateral in the LTV calculation.

Source: SNB

#### LOAN-TO-INCOME: NEW MORTGAGES

Proportion where imputed costs exceed one-third of income (owner-occ.) or rents (inv. prop.) at an interest rate of 5%

Chart 15



Source: SNB

#### INTEREST RATE MARGIN OF DOMESTICALLY FOCUSED COMMERCIAL BANKS

Weighted average Chart 16
%
1.9
1.8
1.7
1.6
1.5
1.4
1.3

Sources: FINMA, SNB

06

07

08

09

10

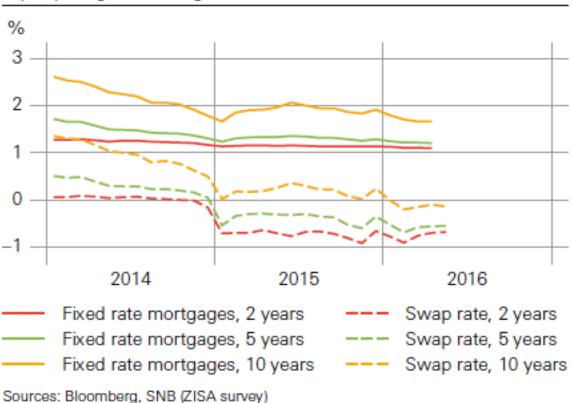
1.2

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#### PUBLISHED INTEREST RATES ON NEW FIXED RATE MORTGAGES AND SWAP RATES

Equally weighted average

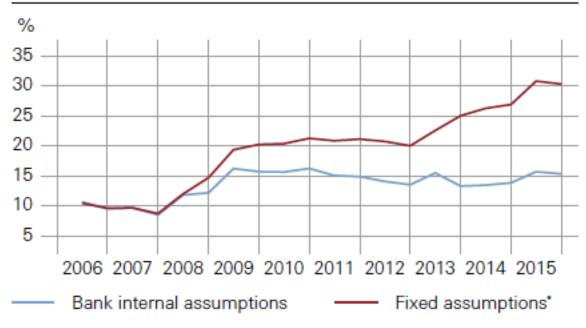
Chart 17



#### INTEREST RATE RISK OF DOMESTICALLY FOCUSED COMMERCIAL BANKS

Losses in NPV with 200 bp interest rate rise and different replication assumptions; as percentage of Tier 1 capital

Chart 18

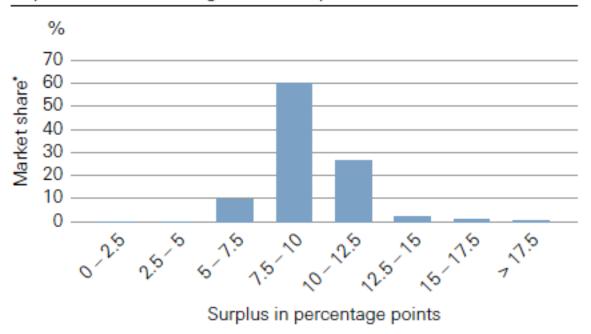


<sup>\*</sup>Assumed repricing maturities of 1.5 years for savings deposits and variable rate mortgage claims, and of 15 days for sight deposits.
Sources: FINMA, SNB

#### RISK-WEIGHTED CAPITAL RATIOS OF DOMESTICALLY FOCUSED COMMERCIAL BANKS

Capital surplus with respect to the Basel III 8% minimum requirement for risk-weighted total capital ratios

Chart 19



<sup>\*</sup> Share of domestically focused banks' total leverage ratio exposure. Sources: FINMA, SNB

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#### Basic characteristics of Swiss CCB

- The CCB can be applied on a broad basis or to exposures to specific sectors
- The maximum level of the CCB is set at 2.5% of total domestic RWA
  - On aggregate, mortgage credit amount to about 50% of domestic RWA
- Banks are given between 3 and 12 months to fulfill the requirements, depending on assessment of the situation
  - Transition period at first activation: 8 months
  - Transition period for the increase: 5 months
- First experience regarding the frequency of CCB decisions: one decision per year is realistic

# CCB decision-making process: A 'guided discretion' approach

- The approach combines a rule component...
  - Mechanical guidance built on 4 key indicators
- ...with a discretionary component
  - The mechanical guidance can be 'overruled' based on an analysis of additional ("secondary") indicators
  - Discretion important given the substantial uncertainty and complexity of measuring imbalances in the credit market

# Key indicators

- The key indicators play a major role in the decision regarding turning the CCB on/off and regarding its size
- SNB relies on a combination of mortgage credit variables and residential real estate price indicators
- Pragmatism needed: only limited experience with indicators to assess position on the financial cycle
  - Calibration is, necessarily, based on one crisis only

#### Additional indicators

- Monitored on a regular basis to provide information used as part of the discretionary decision making process
- The greater the heterogeneity among the key indicators, the more weight is put on the discretionary component
- Additional indicators include
  - Indicators of bank risk
  - Alternative measures of credit conditions and real estate prices
  - Measures of general economic conditions
  - Soft indicators: qualitative survey data from SNB's regional network

### Financial stability: the Swiss lesson

- In the restricted context of the Swiss economy
- A stable financial system is not an impossible dream
- It is a matter of political will
- Build on the conviction that there is a need to act
- And the readiness to accept paying the price of precaution when knowledge is limited

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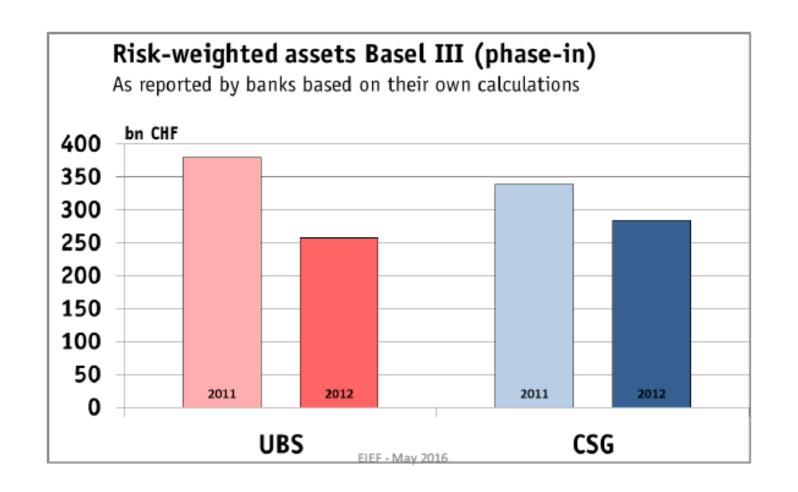
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### Financial Stability Problem #2: UBS & CS

- TBTF but also Too Big to Save
- Make them safe to fail
- At the forefront since 2009 (largely under the impulse of the SNB) but slowed down by the international environment
- Capital and liquidity requirements with 'Swiss Finish'
  - RWA up to 19% with progressive component (including Cocos)
  - Leverage ratio of 5%
  - Liquidity requirements "Swiss regime" in effect since 2012
  - TLAC
  - Limits to internal models
  - Living wills (both banks are now Holding company and have separate Swiss entities)

#### A measure of success ...



# A closing Window?

- Strong resistance, internal and external
- Ferocious lobbying