

Banking union 1.0: challenges for Spanish banks

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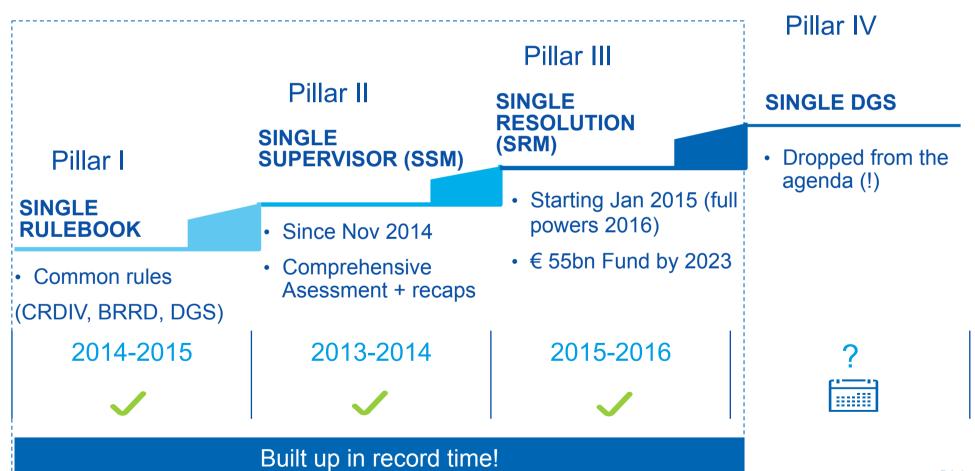
1.- The banking union:1.0: a milestone that needs completion

BU 1.0 was pivotal in underpinning the euro and BU 2.0 will be so in breaking the bank-sovereign doom loop for good



Banking union 1.0: we are already there

New supranational architecture for banking regulation & oversight





The BU 1.0 helped underpin the Euro...and it has achieved a lot more

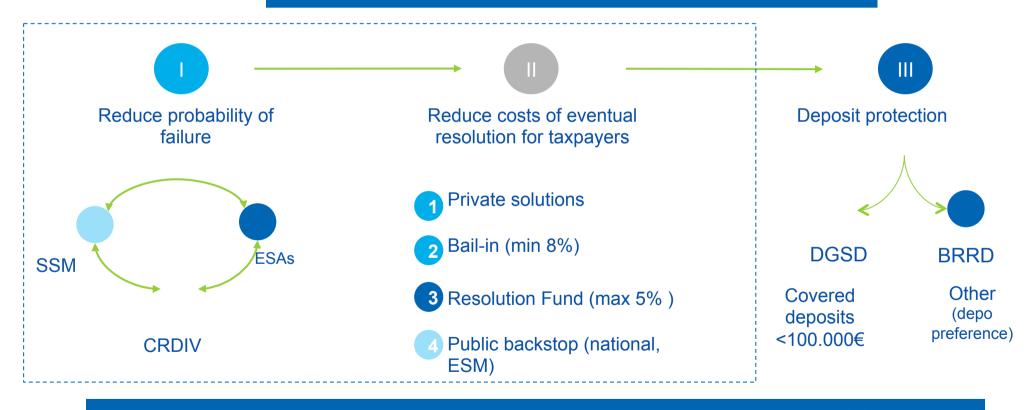


- A European control center for banks: unthinkable only a few years ago!!
- But: complex setup and further harmonization in key concepts still required:
 RWA, NPL, national discretionalities, model validation, etc



Triple regulatory action to restore confidence in banking sector

A PREDICTABLE AND CLEAR FRAMEWORK



Legacy issue addressed through Comprehensive Assessment prior to SSM launch



Financial firepower of the resolution fund: will it suffice?

All banks in the EZ should contribute

Ex-ante €55bn (1% covered depos) only in 2023, but together with a new paradigm

- More vigilance
- Better plans (RRPs)
- Bail-in

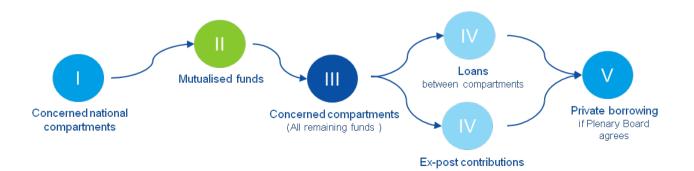
And also **ex-post** financial power:

- Ex-post contributions Private borrowing Public backstop

Progressive mutualization of contributions to the SRF



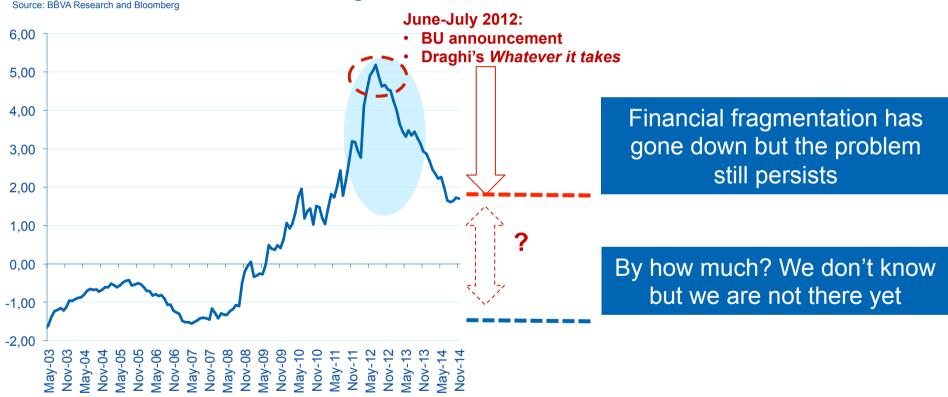
Use of the Single Resolution Fund (2016 - 2023)





It will take time to break the vicious circle but BU 1.0 has put us on the good track...

Composite measure of EZ financial fragmentation



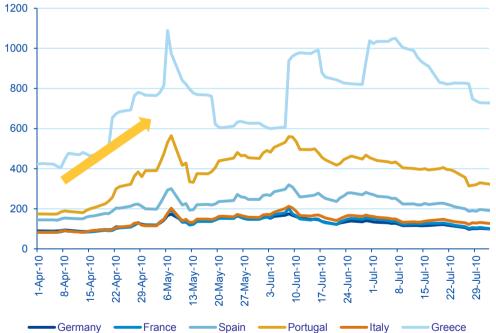
Arrival point: credit conditions dependent on credit worthiness (not location!)



The banking union has helped moderating the contagion of banking crises



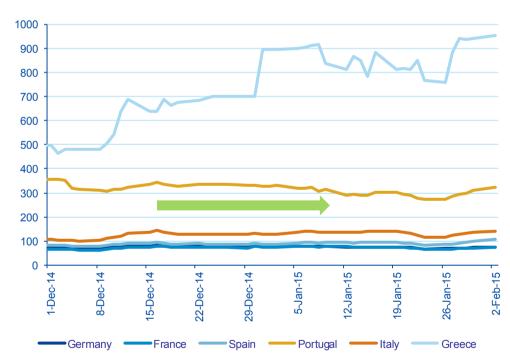
1000



Greek first rescue: May-10

Banks' CDS (weighted average, by assets)

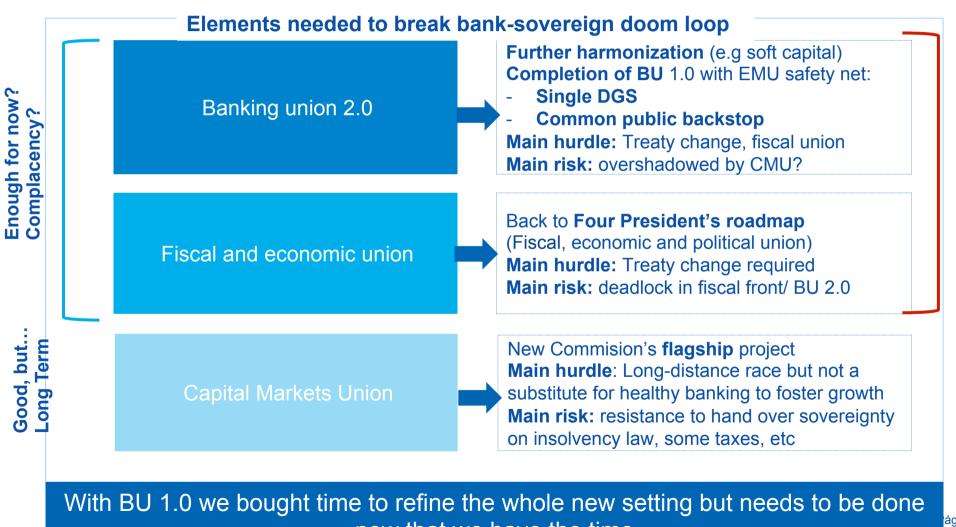
Source: BBVA Research and Bloomberg



Greek elections and deposit run: Jan-15

Hand in hand?

What's missing from banking union 1,0?



now that we have the time

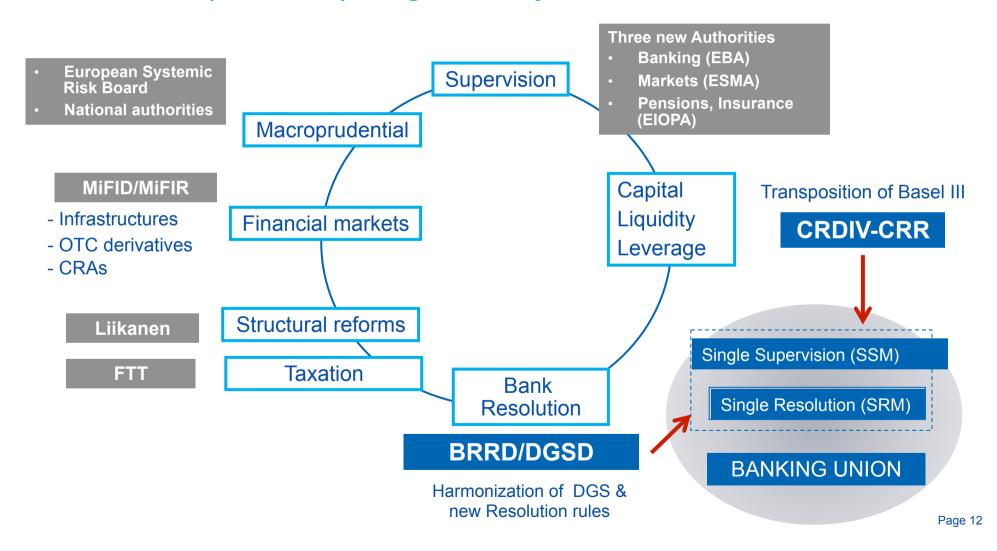


2.- Challenges for the Spanish banking system

Banks will go under significant internal changes in order to adapt to the new environment but costs are manageable and certainly for a greater good



BU adds (further) regulatory burden...





... with a new institutional complexity



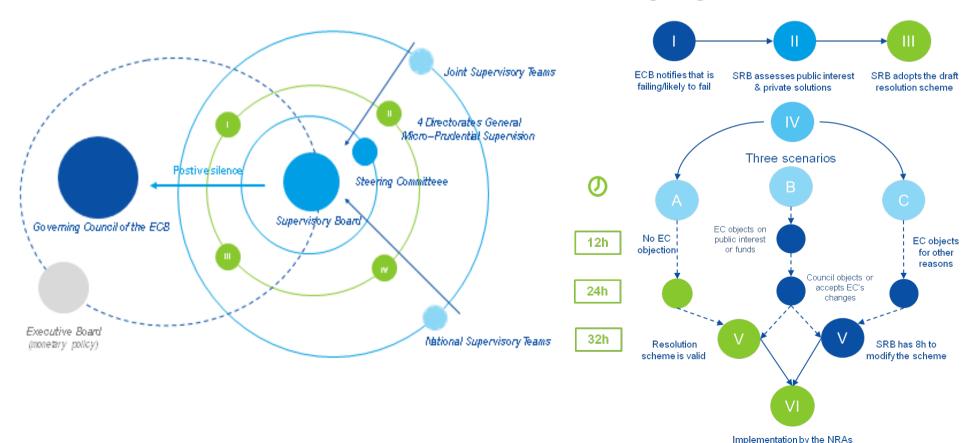


These new animals have complex internal structures and governance

The SSM multidimensional universe

The maze of SRM decision-making

Resolving a significant or cross-border bank





The new supervisory approach

- **MORE QUANTITATIVE & PROCEDURAL**
- **BASED ON BEST PRACTICES**
- **SMOOTH TRANSITION TO NEW STANDARDS**

CONSTRAINED JUDGEMENT

- Less supervisory judgement than for most NCAs
- More emphasis on rules
- Especially for non- significant banks

PROCEDURAL AND TRANSPARENT

- SREP guides the whole process, with strong quantitative approach
- Governance become relevant (document every decision)
- Transparency and disclosure

CONSISTENCY

SSM in

steady

state

Level playing-field across EZ SREP approach to Pillar 2 more quantitative Based on **peer-review** analysis

PROPORTIONALITY

 Toughness and intrusiveness increasing with bank significance

RISK-BASED

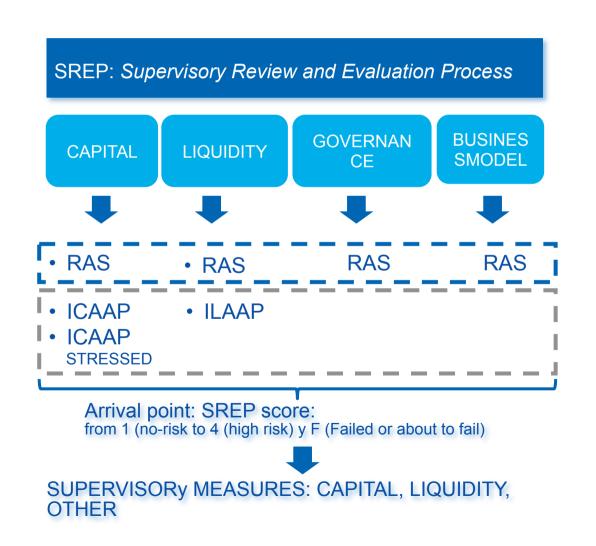
- Thematic risk assessments
- Peer-review analysis

FORWARD LOOKING

- Stress tests here to stay
- Lots of data requirements



The new SREP



New key concepts: SREP, ICAAP/ILAAP, RAS

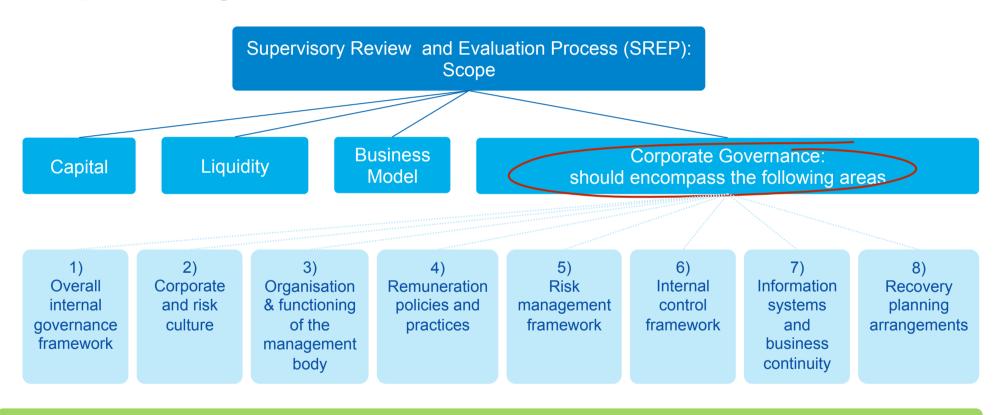
Risk Assessment System (RAS) On-going evaluation by ECB

Internal Adequacy Assessment Process (ICAAP/ILAAP)
Annual, banks with ECB appraisal

Pillar 2 becomes essential part in supervisory dialogue: avoid national discretions to preserve consistency



Corporate governance and the new SREP



Competent authorities will evaluate the risk of prudential impact posed by poor governance and control arrangements and their effect on the viability of the institution



Main challenges in supervision

PRODUCE AND MANAGE DATA

Quantitative approach together with more transparency and disclosure generates lots of data requests

Data must be gathered and managed

Update systems and processes

CULTIVATE GOOD RELATIONSHIP

Develop a good work environment with new authorities (SSM, BoS, ESRB, EBA, SRB/FROB)

Get them to understand the bank's business model

Macroprudential: who to address to and for what?

SET UP GOOD PROCEDURES & DOCUMENTATION

Communicate efficiently data, business plans, governance, internal control procedures, etc

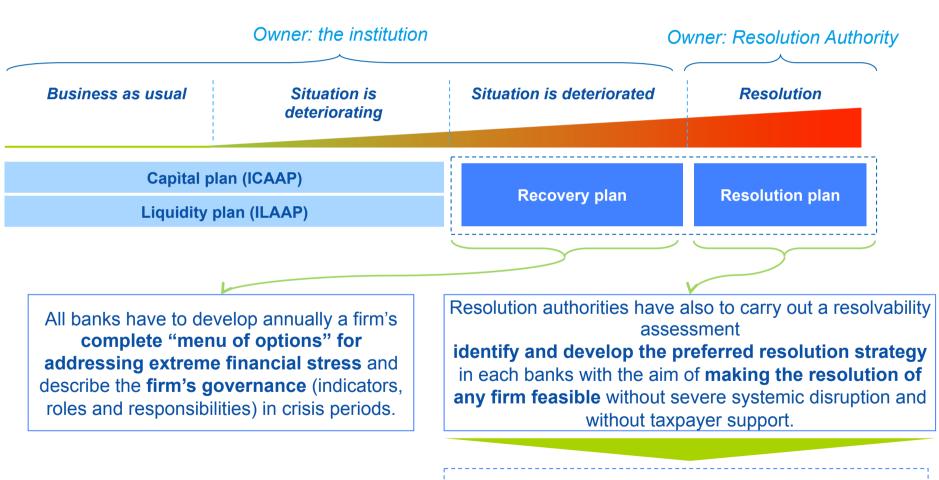
All **decisions** must be properly **documented** and ready to be shown to the supervisor

EFFICIENT INTERNAL COORDINATION

Strong internal coordination will be required to collaborate in the ICAAp, ILAAP, RRPs, RAF, etc



Main challenges in resolution

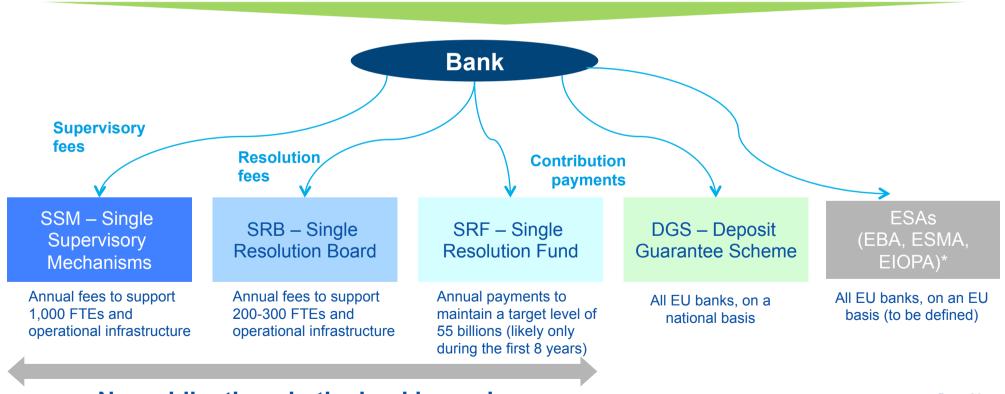


As a result, resolution authorities will determine the minimum requirement of bail-inable liabilities (MREL)



The new fees & contributions for banks

All banks will have to finance the new institutional framework – the SSM and the SRB – and to fund the new private resolution fund – the SRF.





3.- How do Spanish banks stand amid the BU 1.0?

Spanish banks are now in good shape, but profitability will be an issue going forward



How do Spanish banks stand amid the BU 1.0?

The Spanish economy will grow at lower rates, closer to its potential growth

There will be low interest rates and the deleverage process will continue

New fintech players and technological progress will increase competition, changing the way in which entities operate and their relationships with their clients

Capital Markets Union will foster non-banking financing

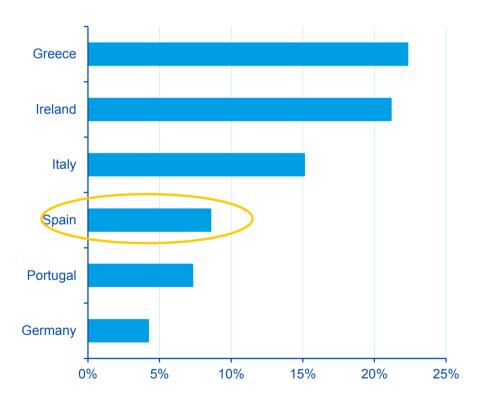


Low profitability, unlikely to return to pre-crisis levels



Spanish banks are now in better shape than other European peers

NPL ratio (% total loans, Dec-13)
Source: BBVA Research based on EBA Stress Test



Spanish banks have a lower burden of legacy assets than other European banking systems, as they have gone through the cleaning of the balance-sheets

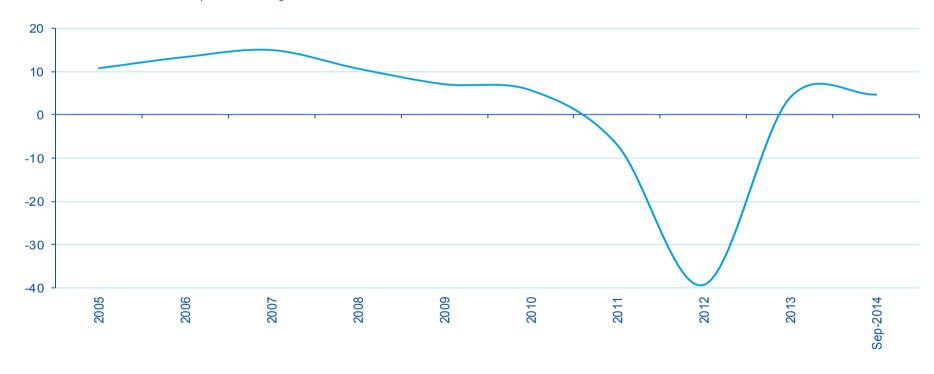


Profitability: The system is unlikely to return to pre-crisis levels

Return on Equity* (%)

Source: BBVA Research based on Bank of Spain and Bloomberg

According to EBA, the Cost of Equity will be 8-10%



Will profitability cover the cost of capital?



Banks will have to overcome obstacles and uncertainties in this new landscape

Higher cost of issuing capital, due to new requirements of more capital (and of better quality)

Obstacles for concentration / bank mergers:

- Retail and wholesale banking separation
- "Too big to fail" regulation
- Supervisory objections to international expansion







Lower profitability



The Banking Union will help to bridge the gap between cost of equity and profitability

The European financial system will be more resilient



Lower cost of equity

Concentration, first domestic and second cross border, searching for profitability.
Concentration is still far from generating competitive distortions

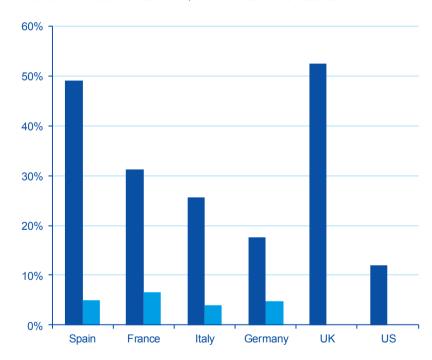




Higher profitability

Assets of the main domestic player (2013, %GDP)

Source: BBVA Research based on IMF, AEB and entities' annual accounts



Assets/Domestic GDP Assets/EMU GDP

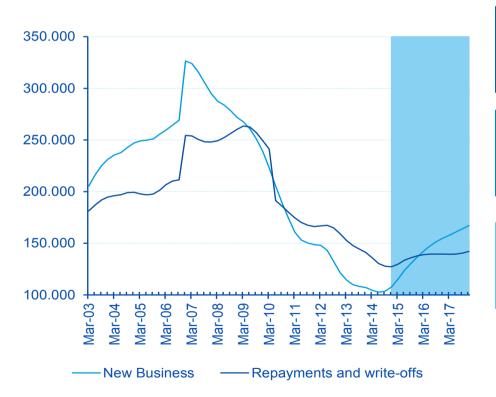
The size of European financial institutions is not excessive, and even less so when compared to the euro area economy



The deleverage process will continue, so credit will not strongly support profitability in the short term

Private Sector: New Loans and Repayments

(Quarterly figures, EUR mn)
Source: Bank of Spain and BBVA Research



Deleverage is needed in terms of stocks but must be compatible with new credit to solvent demand, to support the recovery

New lending will not exceed repayments (outstanding credit will not grow) until end-2015

Should we think that the Say's law applies to credit?



Financial fragmentation is affecting credit conditions

Determinants of interest rates on new bank lending

(to non-financial corporations, less than 1million €) Source: BBVA Research based on ECB and Bloomberg

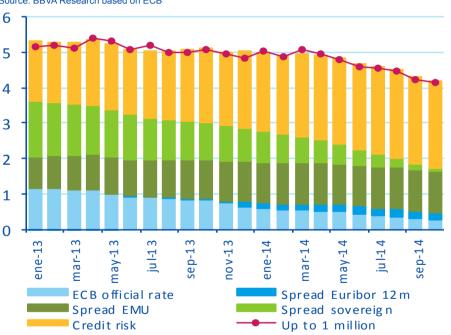
	France	Spain	Italy
Commercial policy	1,55		
ECB official rate	0,79	1,37	1,26
Spread 12 months (12m-Euribor)	1,19	0,83	
Spread EMU (10y-Euribor)	0,28	0.41	0.18
Spread sovereign (10y country-10y EMU)		0,70	0,69
Firms default rate		0,12	0,21

-- Does not differ significantly from zero

The reduction in the Spanish risk premium and in the ECB official rate have explained most of the fall of credit rates

Contributions to interest rates on new bank lending

(to non-financial corporations, less than 1 million €)
Source: BBVA Research based on ECB



In the future, the ongoing reduction in firms' default rate (credit risk) will contribute to the contraction of credit rates



Wrap up

BU 1.0 was pivotal in underpinning the euro and BU 2.0 will be decisive in breaking the bank-sovereign doom loop

Banks will go under significant internal changes in order to adapt to the new environment but costs are manageable and certainly for a greater good

Spanish banks are now in good shape, but profitability will be an issue going forward. Something's got to give!



Thank you!