Housing finance: some International trends after the crisis

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Housing market: the origin of the crisis

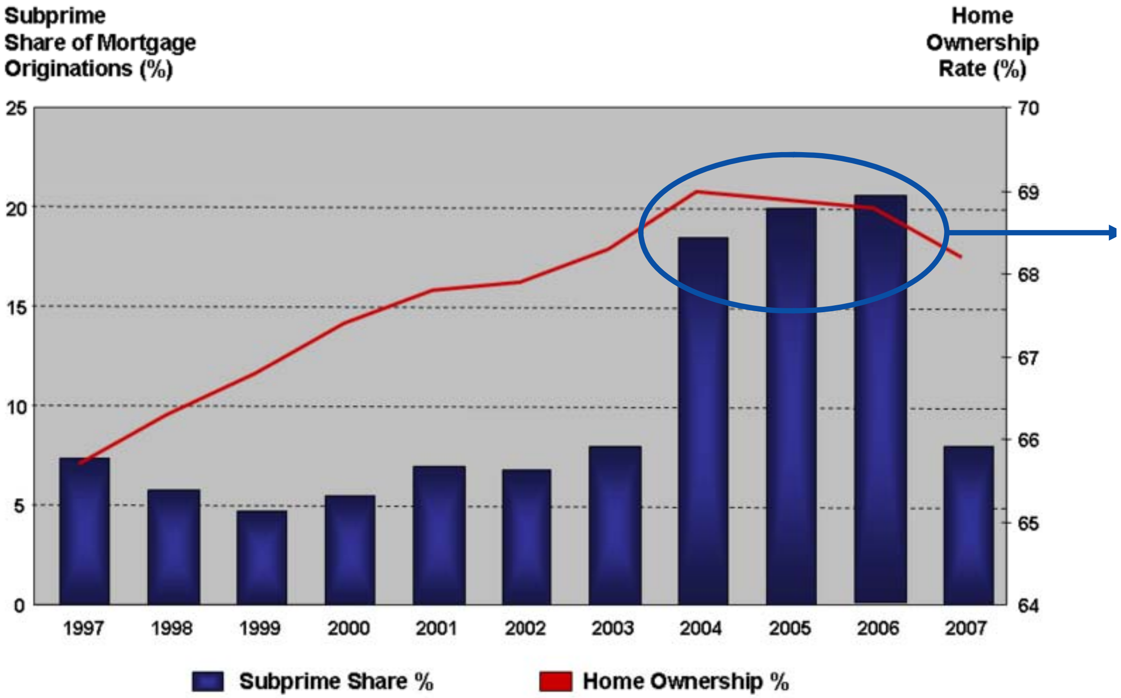
- The bigger the housing bubble, the more devastating impact on the countries' economic activity
- Propagated through securitisation schemes

No surprise a significant part of the reform effort is concentrated in housing finance:

- Sounder underwriting
- Sounder securitisation mechanisms
- Macroprudential tools to prevent/fight housing bubbles
- Disclosure of market practices in securitised markets

Sounder underwriting in mortgage lending

US subprime lending: perfect example of poor underwriting



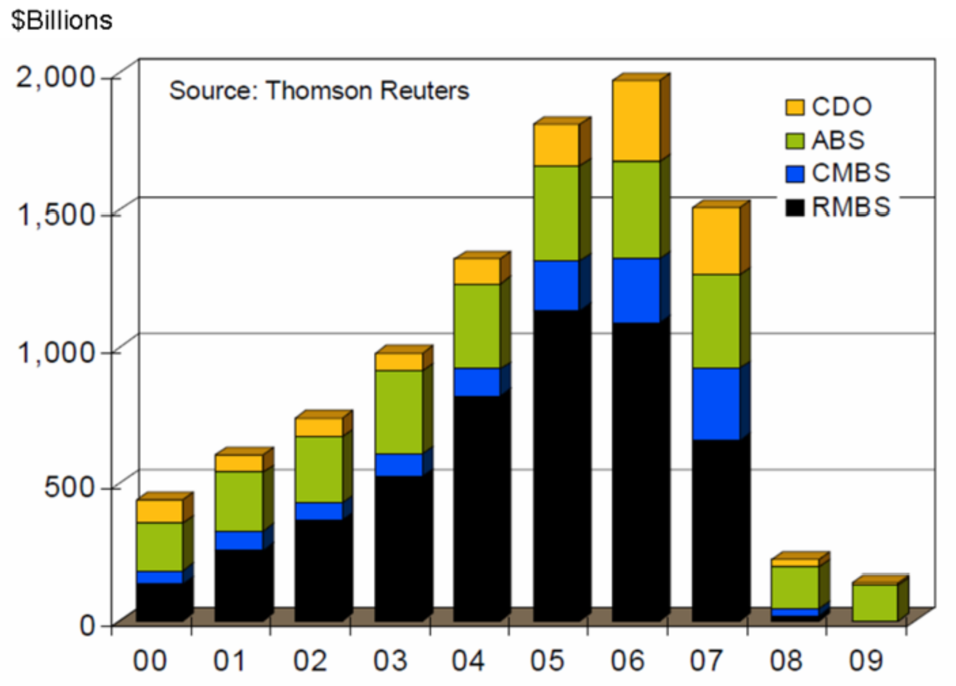
Sources: U.S. Census Bureau; Harvard University- State of the Nation's Housing Report 2008

Need to restore basic underwriting rules:

- Verification of the borrower's income
- Payment capacity of the borrower during the whole life of the loan
- Setting of reasonable references for debt service coverage
- Use of both LTV and LTI (affordability) ratios
- Reliance on house price increase expectations should be avoided
- Independence of appraisers
- Other practices: limits to LTV, mortgage insurance (the Canadian model is seen as a good practice)

Sounder securitisation mechanisms

Securitisation market activity



- Almost halted by the crisis, and will never be the same
- But its rationale is still strong: (i) helps mobilising illiquid assets; (ii) transfers credit risk to more diversified holders, willing to hold this risk; (iii) contributes to correct maturity mismatches; (iv) reduces the cost of credit; and (v) in emerging markets, fosters financial deepening, helps develop capital markets and promotes housing development
- Challenge now: to make securitisation compatible with financial sector soundness and restore the correct incentives: (i) better underwriting; (ii) increase transparency; (iii) improve standardisation and simplicity of ABS; (iv) issuers should retain more exposure (skin in the game); and (v) avoid regulatory arbitrage to Off-Balance Sheet Entities.

Macroprudential tools (I)

Table 1

Macroprudential instruments by vulnerability and financial system component

		Financial system component				
		Bank or deposit-taker		Non-bank investor	Securities market	Financial infrastructure
		Balance sheet*	Lending contract			
Vulnerability	Leverage	• capital ratio • risk weights • provisioning • profit distribution restrictions • credit growth cap	• LTV cap • debt service / income cap • maturity cap		• margin/haircut limit	
	Liquidity or market risk	• liquidity / reserve requirements • FX lending restriction • currency mismatch limit • open FX position limit	• valuation rules (eg. MMMFs)	• local currency or FX reserve requirements	• central bank balance sheet operations	• exchange trading
	Interconnectedness	• concentration limits • systemic capital surcharge • subsidiarisation				• central counterparties (CCP)

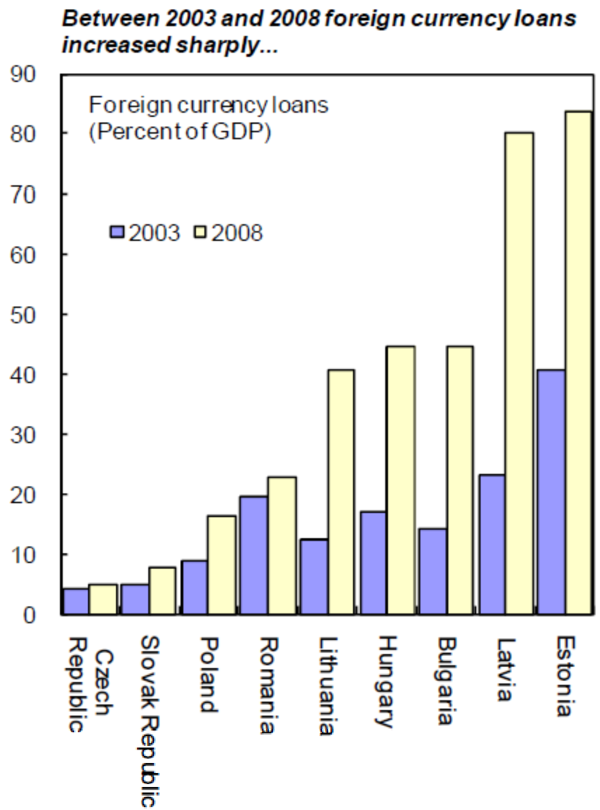
* Capital and other balance sheet requirements also apply to insurers and pension funds, but we restrict our attention here to the types of institutions most relevant for credit intermediation.

Source: CGFS, 2010

- Some initiatives designed to deal explicitly with housing bubbles:
  - LTV ratios: caps or adjustment factor to correct house price increases in LTV valuations
  - Affordability: limits to debt servicing / income ratios (EU Directive sets an indicative range: 33% - 50%
  - Credit growth: introduction of limits or a capital surcharge when credit growth exceeds a certain threshold
  - Mortgages denominated in foreign currencies (next slide)

Macroprudential tools (II)

Foreign currency-denominated mortgages in Central and Eastern Europe



- Source of risk in CEE countries (previously in Latam)
- Attractive (for the customers):
  - Lower nominal rates
  - Absence of long-term funding in local currency
  - Monetary illusion, especially in a boom: rising house prices + capital inflows + appreciating domestic crisis
- However, credit risk remains: even if there is matching in forex, borrowers' income is still denominated in their own currency
- Consumer protection issue
- Several measures implemented to limit this practice: ,higher risk weight in CAR; higher downpayment; higher provisions; higher reserve requirements; liquidity requirements; ceilings; outrigjht prohibition
- Recent case of Hungary: posibility to convert mortgages into domestic currency at an exchange rate favourable for the borrower

Macroprudential tools (III): Asian countries

- Asian countries particularly active with regards to the use of macroprudential instruments to counteract housing bubbles:
  - Lessons learned in the Asian crisis
  - Only region in the world where the housing boom has resumed in the recent period
  - The case of Korea especially interesting: reduced LTV limits for lending in certain geographic areas (declared as "speculative zones") since 2003

Asian experience with macroprudential tools

Objective	Tools	Examples
Manage aggregate risk over time (ie procyclicality)	• Countercyclical capital buffers linked to credit growth	• China[1]
	• Countercyclical provisioning	• China, India
	• Loan-to-value (LTV) ratios	• China, Hong Kong SAR, Korea, Singapore
	• Direct controls on lending to specific sectors	• Korea, Malaysia, Philippines, Singapore
Manage aggregate risk at every point in time (ie systemic oversight)	• Capital surcharges for systemically important banks	• China, India, Philippines, Singapore
	• Liquidity requirements / funding	• India, Korea, Philippines, Singapore
	• Limits on currency mismatches	• India, Malaysia, Philippines
	• Loan-to-deposit requirements	• China, Korea

Source:Source: Caruana,J: Macroprudential policy: working towards a new consensus, 2010

Disclosure of market practices to ensure discipline in securitised markets

Securitisation: immense potential for contagion across borders

Investors: Holders of ABS have no idea of underlying assets

Contrast:
Local primary markets vs global secondary markets

Implications:

- Market practices and regulation present wide international differences …
- … but risks are widely dispersed across borders

A public **disclosure** of the main aspects concerning the soundness of the national mortgage markets and underwriting practices is necessary:

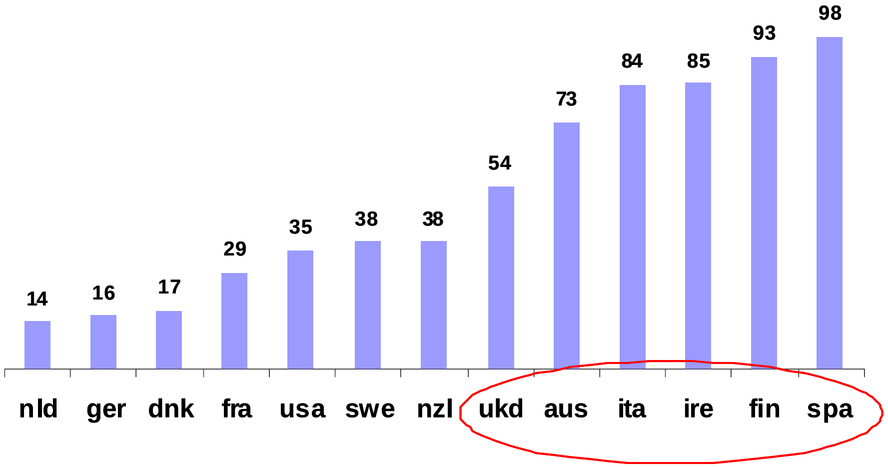
FSB Peer Review of mortgage underwriting and origination, March 2011

Variable vs fixed rates & Early Repayment Fees (I)

- Sharp contrast between countries

Variable rate mortgages

% of total mortgages



- Very positive in countries like Spain during this crisis (low interest rates)…
- …but it could be different in a typical crisis, if rates rise
- It is a serious vulnerability

These difference among countries suggests the existence of failures in the supply side of the market in those countries where a certain type of mortgage is prevalent

– Possible explanation: Early Repayment Fees

Variable vs fixed rates & Early Repayment Fees (II)

Country	Interest Rate and Market Share*	Early Prepayment Fee*	Typical LTV ratio**	Typical Term**	Residential mortgage debt to GDP	Owner occupation rate
Denmark	ARM → 45% Fixed → 55%	• Unique model: FRM can be repaid through repurchase of a bond in secondary market. No penalty or fee	80%	30 years	92,8%	54,0%
France	Fixed → 70%-80%	• Limit: the lower between (i) six month's interest payments or (ii) 3% of the outstanding mortgage amount. • No fee if early payment due to death, involuntary redundancy or job-related location	75%	15 years	34,9%	56,5%
Greece	ARM → 27%	• No re-payment fees for ARM	75%	17 years	30,2%	80,1%
Germany	Renegotiable with a fixed period of 5-10 years → 55%	• No repayment possible during first 10 years of a FRM, unless good cause and full compensation to lender • Fees on ARM strictly prohibited	70%	25 years	47,7%	43,2%
Italy	ARM predominant since 4Q2006	• Law 40/2007: no penalties on mortgage contracts executed after Feb.2007. Also reduction in the amount applied to mortgages prior that date. • Previously, informal agreement ≤ 5% principal	50%	15 years	19,8%	80,0%
Spain	ARM → 93%	• Penalty for early repayment: Law Dec. 2007 sets ceiling in of 0,5% of prepaid amount during the first 5 years of the mortgage loan, and 0,25% after that. • Compensation for interest rate losses: only for mortgages with interest rate revision > 1 year (in practice a very small percent of total mortgages) • Previously, maximum fees were 1% and 2.5% for variable and fixed rate mortgage contracts respectively.	70%	20 years	61,6%	86,3%

Source: *Hypostat 2007. A Review of Europe's Mortgage and Housing Markets. European Mortgage Federation and **IMF (2008), information referring to the period 2003-2006

Note: F means that majority of mortgage loans are fixed rate (fixed at least for a period of 5 years); V means majority of variable rates
1: as % of outstanding residential loans

Recourse vs transfer of property

- The possibility to pledge the house in lieu of payment already exists in various countries.
- In other countries the tradition is "recourse": the debtor is liable for the whole of the debt even after foreclosure
- When both possibilities coexist, it is a matter of pricing.
- In some states in the US, the possibility of pledging the house in lieu of payment has arguably led to a rapid spread of the crisis
- If introduced retroactively:
  - the impact on the banking sector would be extremely negative
  - would introduce legal uncertainty
- Moreover the ABS market might be impacted, and future securitisations too.
- Possible solution:
  - clients should be offered different types of mortgages (fixed/ flexible; with/ without recourse, so that they can choose between them