

Comments on:

The impact of macroprudential policies and  
their interaction with monetary policy: An  
empirical analysis using credit registry data

by

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# Question and Answer of Paper

- Q: What are effects of macroprudential policies on procyclicality in Latin America?
  - Meta analysis using credit registry data of 6 countries
- A: Macroprudential policies have effects
  1. Have stabilized credit growth
  2. Been complements to monetary policy
  3. Buffer policies especially effective in limiting risks
- Provides important policy lessons

# Relevance of and praise for paper

- Surely a worthwhile topic, especially for policy
  - While macroprudential policies (MAPs) used more, know little on effectiveness, interactions with other policies, notably monetary policy, and also risks
  - Many focused on this: academics, policy makers,....  
But empirics (and theory) still limited
- Praise and agree with main findings
  - Careful analysis, new data sources: credit registries
  - Combining multiple countries in meta analysis
  - Sensible results, concur with many others and theories

# Four Main Comments, Mostly on Underlying Studies, not on Meta

1. Literature: could be positioned better
  - Adds much to existing literature
  - Can show more of methodology and in framing
2. Think more on type of MAPs
  - Differences in impact? Why? Exploit more explicitly
3. Do more tests with data
  - Credit registry data allow for many more tests
  - Prices vs. quantities. Intensive vs. extensive. Risks
4. Clarify interactions MAPs with monetary policy
  - Complements, substitutes; use vs. impact: not so clear
  - Write-up and methodology can be more explicit

# 1. Literature and value added

- Value added could be sharpened
  - Most studies are aggregate, cross-country
    - Such studies have some strengths, but many weaknesses
  - Only very few use micro data (US, Korea), rarely credit registry (Spain, Uruguay)
    - Some of these more event, not time series
    - Most do not study explicitly bank characteristics
  - None allow for cross-country comparisons
- Highlight value added and sharpen motivation!
- Cast this set of papers as doing much better!



# Literature and value added (continued)

- Other studies have weaknesses
  - Suffer from endogeneity: as MAPs may be adopted in response to a boom, when credit cycle is already turning; or in a bust, when deleveraging is in process
  - Cannot control for many factors, notably demand
  - Or detect channels through which MAPs operate
  - Hard to know tradeoffs (if any) between less credit, reduced risk taking and real economic costs
- Stress advantages of data and methodology here
  - Very detailed, firms-banks matched data
  - Little/no endogeneity, omitted variables, etc.

## 2. Differences in impacts of MAPs

- MAPs' aims and targets can and do vary
  - Some disincentives, some buffers, some dispel
  - Some financial institutions-, some borrower-based
    - Many target specific (balance sheets, income, other) items of banks or borrowers
- With registry can explore impacts in detail
  - Allows for identification of channels: Do capital tools work through capital? Liquidity through liquidity? Demand through borrowers' leverage or debt-service/income? Can test more formally
  - Can also use Amemiya-Weinstein procedure or WLS



### 3. Empirics: do more. On prices, intensive vs. extensive margins, risks

- Also investigate prices (rates, spread charged)
  - If you observe rates, how do they (differentially) adjust to MAPs? Is price a mechanism to reduce?
- Focus on intensive margin, but also do extensive
  - Yes/no renewed; yes/no new firm getting financing
  - Also do firms switch lender in response to MAPs?
- Ask also if the risks of firms is reduced by MAPs
  - Do MAPs make it less (or more) likely more risky (e.g., high leverage) firms get more financing and more likely (or less likely) to end lending?

# Other empirical comments

- Why, how do larger banks have less impacts?
  - Is this access to interbank markets, (preferential) bonds, CP, etc.? Related to TBTF? Or is importance due to funding source differentially affected by MAPs (deposit vs. whole-sale; FX vs. LC, short-term vs. long-term)? Evasion? Can you explain more?
- Other type of bank effects
  - E.g. relation vs. transaction: clientele (thus SMEs hurt more)? Lending by less informed? In extensive margin good screening, but in intensive margin is it more relationships or Zombie firms? Interpretation?

# 4. MAPs and monetary policy (MOP). Clarify the questions

- MAPs and MOP can
  - Be used in complementary ways
    - $d(\text{credit})/d(\text{MAP}) > 0$  and  $d(\text{credit})/d(\text{MOP}) > 0$  ?
  - Stances can affect each others' impact
    - e.g.,  $d(\text{credit})/d(\text{MAP} | \text{MOP}=0) >>> 0$  (ZLB) ?
  - Can complement each other in their effectiveness
    - $\delta^2(\text{credit})/\delta(\text{MAP})\delta(\text{MOP}) > 0$  or  $< 0$ ?
- And need to consider each primary goal too
  - Is MOP trying to affect  $\pi$  and  $Y$  (efficiently)?
  - Is MAP trying to affect credit (efficiently)?

## 4. MAPs and MOP (continued)

- Clarify some of these as they can be tradeoffs
- Channels and time lags can matter here
  - MOP may reduce asset prices, which in turn reduces leverage buildup, thereby reducing booms
    - Study both channels (asset prices & credit) and lags
- Evasion, “getting in the cracks”, and risk taking
  - MAPs affect bank credit, MOP may affect bank and non-bank credit
    - Look at non-bank financing of firms in response to MAP
    - Explore risk taking channel of monetary policy

# Comments on meta study

- Well done and clearly presented
  - Explicit on methodology used. Provides much details
- Still a few comments
  - Obviously, degrees of freedom can be few (5, 6)
  - Related, not clear how to think of selection bias: did those selecting certain tools expect more impact from these tools? Are there ways to correct for this?
  - Was not clear if all papers use same specification or not (some do include firm\*time fixed effects, others not). Preferably meta results for the same specification



# Presentational comments

- Do more on economic importance of factors
  - Notably banks' balance sheets. Cannot infer economic importance. What MAPs highest impact? If small because of avoidance or other problems?
- Related papers and literature
  - Highlight IBRN, macroprudential policies spillovers, and Buch and Goldberg, meta study closely relate
  - Capital flow management tools matter for SOEs, include, besides related papers, a discussion
  - Make more comparisons with other studies' results