

# Discussion of Araujo and Leão

## *OTC Derivatives: Impacts of Regulatory Changes in the Non-Financial Sector*

*Sixth BIS CCA Research Conference  
Banco de Mexico  
13-14 April 2015*

*Michael Moore  
Warwick Business School, UK*

# OTC Derivatives: Impacts of Regulatory Changes in the Non-Financial Sector

- *Why this paper is important*
- *What this paper does*
- *What this paper does well*
- *What this paper could do even better*

# Why this paper is important...

- ***New literature on macroprudential use of international capital controls***
- ***Welfare gains in terms of preventing asset price bubbles are clear***
- ***Is there a downside for the real sector?***

# What this paper does...Introduction

- *Natural experiment*
- *On September 16<sup>th</sup> 2011, Brazil imposed a tax on FX derivatives short positions only*
- *Authors have access to database of all non-deliverable foreign exchange forward contracts*

# What this paper does...Theory

- *Assume non-financial firms long USDBRL forward positions are offset by short taxable positions by banks*
- *Cost of bank's position measured on transparent, liquid USDBRL futures market*
  - *Compare futures and forward prices before and after tax*

# What this paper does...Testable Propositions

- *For long NDF positions (=short bank futures market positions), forward-futures spread should widen because of tax*
- *For short NDF positions (=long bank futures market positions), forward-futures spread should be unaffected by tax*

## What this paper does... Results

***Controlling for bank and firm characteristics along with variables that affect the FX market:***

- ***For long NDF positions the spread rises by 52%***
- ***For short NDF positions there is no significant effect***

# What this paper does well

- *Very convincing experiment*
- *Unique data set*
- *Very clear result*
- *Importing firm faces a penalty when it needs to hedge a future payment in dollars i.e needs a long USDBRL position.*

# What this paper could no better...econometric techniques

- *Difference-in-differences*
- *Endogeneity of control variables*

# What this paper could no better...equation specification

- *Control variables e.g. Spot FX rate, FX volatility, FX asymmetry need to be motivated in more detail*
- *Instead of fixed effects for banks and firms, it might be better to use measures of firm or bank size*
- *Though the results are always significant, estimates depend on exact specification of control variables*

# Conclusion

- *Very important contribution*
- *Law of unintended consequences*
- *Capital controls at the very least cause gross welfare losses*