Basel III Minimum Capital Requirements

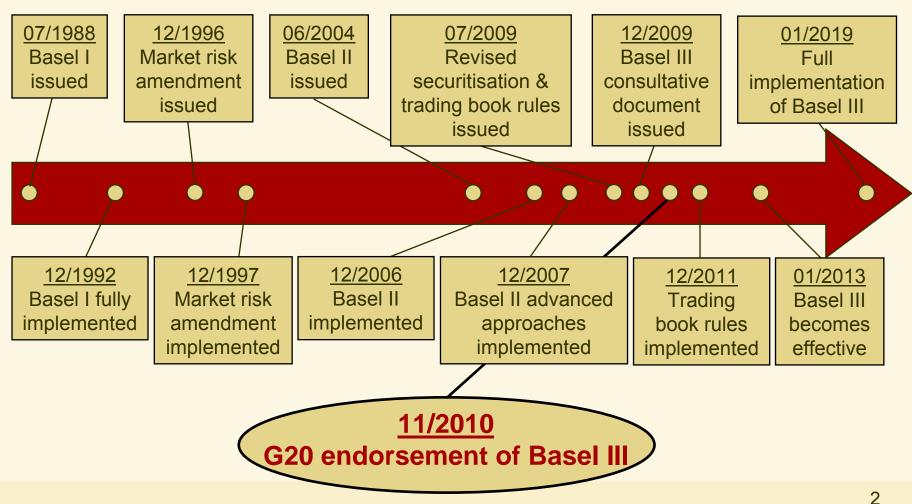
FSI Seminar on Financial Stability
Basel, Switzerland
25 October 2011

Noel Reynolds

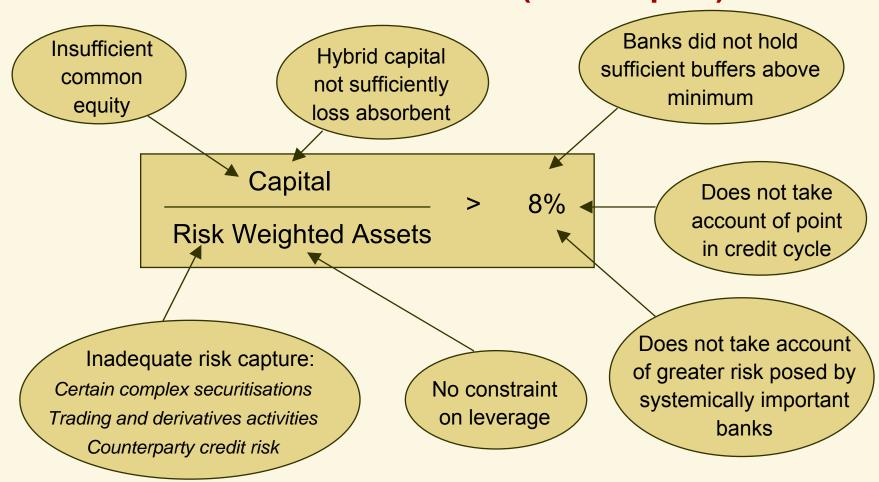
Member of the Secretariat

Basel Committee on Banking Supervision

Timeline of international bank capital regulation



Lessons from financial crisis (bank capital)





Key Elements of Basel III minimum capital framework

- Quality and level of capital
- Capital buffers
 - Capital conservation buffer
 - Countercyclical buffer regime
- Risk coverage enhancements
 - Securitisation
 - Trading book
 - Counterparty credit risk
- Leverage ratio
- Additional loss absorbency requirement for systemically important banks

Quality and level of capital



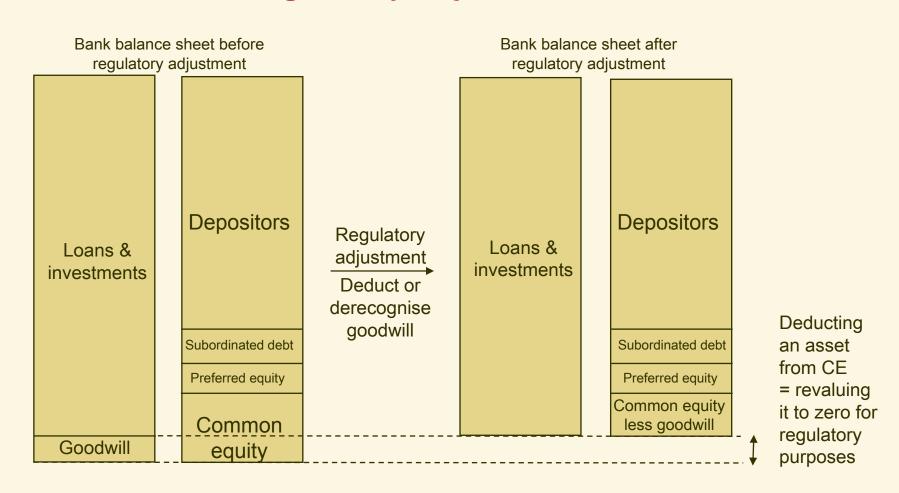
Quality and level of capital

- Big banks entered crisis with insufficient level & quality of capital
- Minimum requirements permitted too little common equity:
 - Total Capital > 8% RWAs
 - Tier 1 (ie Common + pref equity) > Tier 2 (subordinated debt)
 - Common equity "predominant" form of Tier 1
- Deductions applied to Tier 1 or Total Capital
- Basel III Objective:
 - Raise quality, consistency and transparency of capital
- Focus on Common Equity Tier 1
 - Common shares and retained earnings
 - Net of regulatory adjustments (ie deductions from common equity)



BANK FOR INTERNATIONAL SETTLEMENTS

How does a regulatory adjustment work?





BANK FOR INTERNATIONAL SETTLEMENTS

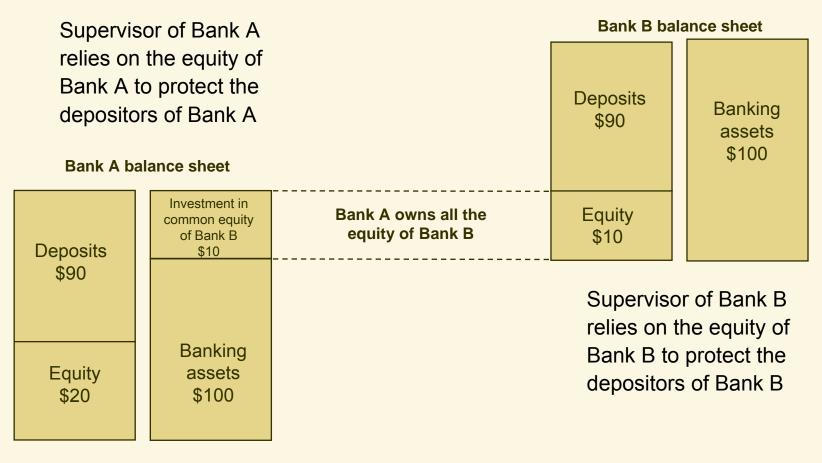
Regulatory adjustments

- Goodwill and other intangibles
- Deferred tax assets *
- Mortgage servicing rights *
- Certain elements of cash flow hedge reserve
- Shortfall of provisions to expected losses (IRB banks)
- Gain on sale related to securitisation transactions
- Gains and losses due to the changes in own credit risk on fair valued financial liabilities
- Defined benefit pension fund assets
- Investments in own shares
- Reciprocal cross holdings
- Investments it the capital of other financial entities *

^{*} Deductions subject to a threshold



Double counting of capital



How much equity is protecting the \$180 of deposits?



Definition and Structure of Capital in Basel III

Balance sheet component	Main (required) features	Going-concern loss absorption	Gone-concern loss absorption
Common Equity Tier 1 (CET1)	Common sharesReserves (eg retained earnings)Less regulatory adjustments	Retained earnings reduced as losses incurred	Subordination in liquidation
Additional Tier 1 capital (AT1)	 Perpetual instruments Fully discretionary coupons / dividends 	 Discretionary coupons/ dividends If accounted for as a liability, required to have going concern write down/ conversion 	 Subordination in liquidation. Point of non-viability writedown/conversion
Tier 2 subordinated debt (T2)	 Subordinated debt Maturity > 5 years Coupons can be mandatory 	• None	 Subordination in liquidation Point of non-viability writedown/conversion



BANK FOR INTERNATIONAL SETTLEMENTS

Capital calibration

- Minimum requirement
 - 4.5% Common Equity Tier 1 to RWAs
 - 6.0% Tier 1 (=CET1 + AT1) to RWAs
 - 8.0% Total capital (=CET1 + AT1 + T2) to RWAs
- Capital conservation buffer
 - 2.5% Common Equity Tier 1 to RWAs
- Factoring in definition of capital and risk coverage, increase in common equity standard of about 7 times for global banks
- Countercyclical buffer (when there is excess credit growth)
 - 0 to 2.5% common equity to RWAs
- Work continues on additional loss absorbency for globally systemic banks



Calibration of the Capital Framework Capital requirements and buffers							
	Common Equity Tier 1	Tier 1 Capital	Total Capital				
Minimum	4.5%	6.0%	8.0%				
Conservation buffer	2.5%						
Minimum plus conservation buffer	7.0%	8.5%	10.5%				
Countercyclical buffer range	0 – 2.5%						



Capital buffers



Capital conservation buffer

- Lessons from the crisis:
 - Banks held insufficient buffers above the minimum.
 - Banks were distributing earnings even during stress periods
- Objective:
 - Establish buffer above the minimum that banks hold outside periods of stress
 - Ensure bank earnings used to rebuild buffer when drawn down
- Buffer range above the minimum is established (0-2.5% CET1)
- If banks' capital levels fall within this buffer range, constraints on the distribution of dividends, on bonuses and share buybacks (but not on the way the bank conducts its business)

Capital Conservation Buffer

Individual bank minimum capital conservation standards						
Common Equity Tier 1 Ratio	Minimum Capital Conservation Ratios (expressed as a percentage of earnings)					
4.5% - 5.125%	100%					
>5.125% - 5.75%	80%					
>5.75% - 6.375%	60%					
>6.375% - 7.0%	40%					
> 7.0%	0%					



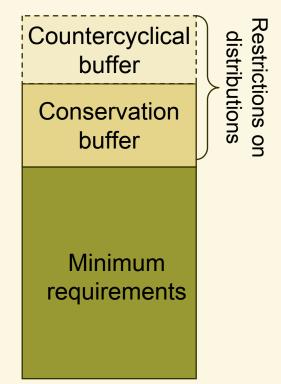
Countercyclical buffer

- Lesson from the crisis: Capital requirements should be able to respond to increased risk from credit boom
- Countercyclical buffer introduced to increase the capital buffer at banks during periods of excess credit growth
- Primary objective: Protect banking sector from periods of excess aggregate credit growth often associated with system-wide risk
- Each jurisdiction responsible for calculating countercyclical capital buffer applicable to all credit exposures in its jurisdiction
 - Common guide (credit-to-GDP guide) and use of judgement
- Buffer subject to an upper bound for reciprocity (2.5%)
- A bank would have one year to get its capital above the top of the range before restrictions come into effect



The functioning of the capital buffers

- The <u>capital conservation buffer</u> establishes a buffer range above the minimum common equity capital requirements.
 When a bank's CET1 ratio falls into this range it becomes subject to restrictions on distributions
- The <u>countercyclical capital buffer</u> works by extending size of capital conservation buffer during periods of excess credit growth





BANK FOR INTERNATIONAL SETTLEMENTS

Risk coverage



Better risk coverage

- Re-securisations
- Trading book
 - Stressed VAR
 - Incremental credit risk charge
- Counterparty credit risk
 - Stressed inputs to measure exposure
 - Credit valuation adjustment
 - Capital incentives for banks to use central counterparties



Leverage ratio



Leverage ratio: what is it?

Risk based ratio

Capital

Risk Weighted Assets

Leverage ratio

Capital

Assets



Leverage ratio: evidence

Mean leverage and risk-based capital ratios for stressed and non-stressed banks

(Data is calculated as at end 2006, all capital ratios in per cent)

Excludes countries with leverage ratio requirements

	Wo	Working Group Sample					Broader Sample				
	Stressed		Other		Stressed		Other				
Risk-based Ratios											
Total capital /RWA	10	11.77	49	12.09		15	11.57	54	11.78		
Tier 1 capital / RWA	10	7.59	48	8.25		15	8.31	54	8.37		
TCE / RWA	8	5.66	45	6.86		14	6.16	58	7.69	**	
Leverage Ratios											
Total Capital / Assets	6	4.32	41	7.62	**	14	4.37	51	6.28	***	
Tier 1 Capital / Assets	6	2.79	41	5.27	**	15	3.02	54	3.65	*	
Common Equity / Assets	6	2.69	41	5.08	**	17	2.64	63	4.48	***	
TCE / Tangible Assets	6	1.93	41	4.34	**	17	2.22	63	3.62	***	

The symbols ***, **, ** indicate that the difference is statistically significant at the 1%, 5% and 10% levels respectively. The Working Group Sample comprises up to 88 banks supplied by national supervisors from 14 countries. The Broader Sample is drawn from the Bankscope database and includes up to 117 banks from 19 countries. Each panel includes the number of banks in the sample and the relevant capital ratio.

Source: BCBS (October 2010), Calibrating regulatory minimum capital requirements and capital buffers: a top-down approach.



Leverage ratio: objectives

- Constrain build-up of leverage in banking sector, helping avoid destabilising deleveraging process which can damage financial system and economy
- Serve as a backstop (floor) to risk-based regime with a simple non-risk based measure
 - Protect against model risk and measurement error



Leverage ratio: definition, calibration, phase-in

- Numerator: Measure of capital is Tier 1
- Denominator: Exposure is based on accounting balance sheet
 - Repos and SFT (accounting measure of exposures + Basel II netting)
 - Derivatives (accounting measure of exposure, + add-on for potential exposure using the Current Exposure Method, and Basel II netting rules apply)
 - Include OBS items with a 100% Credit Conversion Factor (CCF), except unconditionally cancellable commitments (UCC) which have a 10% CCF.
- Calibration: Minimum of 3%
- Phase-in: Migration to Pillar 1 requirement in 2018

Systemically important banks



Addressing the Too-Big-Too-Fail (TBTF) problem

- Global systemically important banks (GSIBs)
 - BCBS and FSB developed a methodology to measure global systemically important banks (not a static list)
 - GSIBs must have additional loss absorbing capacity
 - Proposal to meet additional requirement through common equity (not contingent capital)
- Better resolvability
 - Strengthen resolution schemes (potential role for bail-in)
 - Improve cross border coordination



Basel III implementation

	2011	2012	2013	2014	2015	2016	2017	2018	As of 1 January 2019
Leverage Ratio	Supervisory monitoring		Parallel run 1 Jan 2013 – 1 Jan 2017 Disclosure starts 1 Jan 2015				Migration to Pillar 1		
Minimum Common Equity Capital Ratio			3.5% 4.0% 4.5% 4.5%		4.5%	4.5%	4.5%		
Capital Conservation Buffer						0.625%	1.25%	1.875%	2.50%
Minimum common equity plus capital conservation buffer			3.5%	4.0%	4.5%	5.125%	5.75%	6.375%	7.0%
Phase-in of deductions from CET1 (including amounts exceeding the limit for DTAs, MSRs and financials)				20%	40%	60%	80%	100%	100%
Minimum Tier 1 Capital			4.5%	5.5%	6.0%	6.0%	6.0%	6.0%	6.0%
Minimum Total Capital			8.0%	8.0%	8.0%	8.0%	8.0%	8.0%	8.0%
Minimum Total Capital plus conservation buffer			8.0%	8.0%	8.0%	8.625%	9.125%	9.875%	10.5%
Capital instruments that no longer qualify as non-core Tier 1 capital or Tier 2 capital				Phased out over 10 year horizon beginning 2013					
Liquidity coverage ratio	Observation period begins				Introduce minimum standard				
Net stable funding ratio		Observation period begins						Introduce minimum standard	