



NÁRODNÁ BANKA SLOVENSKA
EUBOSYEM



QUARTERLY COMMENTARY ON MACROPRUDENTIAL POLICY

JULY 2018

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Foreword

Financial system stability is essential for a well-functioning economy. It encompasses many areas, ranging from the security of bank deposits and other similar products to the smooth-functioning of the lending market based on the responsible approach of financial institutions and their customers. The purpose of macroprudential policy is to contribute to financial stability, in particular by strengthening the financial sector's resilience during good times, when risks are typically still at an early stage. This purpose also entails preventing the build-up of systemic risks, so as to make the economy less vulnerable in crisis periods.

Macroprudential policy in Slovakia is implemented primarily by Národná banka Slovenska (NBS), with its formal obligation in this regard laid down in Act No 747/2004 Coll. on financial market supervision. In implementing this policy, NBS may use any of several tools (from mitigating a specific risk to increasing capital requirements across the board), and may apply them in different ways (from issuing risk warnings to laying down statutory obligations).¹ The European Central Bank (ECB) has the power to impose further, stricter macroprudential policy settings.

A key element of macroprudential policy implementation is the regular quarterly assessment of developments in the area of financial stability, and any ensuing decision of the NBS Bank Board to apply a specific instrument. The fulfilment of the core objective, i.e. the maintenance of financial stability, is assessed through the monitoring of five intermediate objectives:²

1. to mitigate and prevent excessive credit growth and leverage;
2. to mitigate and prevent excessive maturity mismatch and market illiquidity;
3. to limit direct and indirect exposure concentrations;
4. to limit the systemic impact of misaligned incentives with a view to reducing moral hazard;
5. to strengthen the resilience of financial infrastructures.

The **first intermediate objective** is to prevent excessive credit growth and leverage, which has been generally identified as a key driver of the financial and economic crisis. This is a particularly important objective in Slovakia, owing to the traditional nature of the financial market in this country. Most of the significant trends, as well as risks, in the domestic banking sector are related to the market in lending to households and enterprises. Looking at loans to the domestic economy as a share of total assets, the ratio in Slovakia is one of the highest of any country, with banks earning the bulk of their income from such lending.

The **second intermediate objective** relates to excessive maturity mismatch in the assets and liabilities of bank balance sheets. In other words, the maturity of banks' assets should not differ significantly from the maturity of their funding liabilities. Although the role of banks is to intermediate the funding of long-term assets (loans) with short-term liabilities (deposits), experience has shown that an excessive maturity mismatch between assets and liabilities makes the financial system more vulnerable and contributes to a build-up of economic and financial imbalances.

¹ Further details about these instruments can be found on the NBS website, at <http://www.nbs.sk/en/financial-market-supervision1/macroprudential-policy>

² The intermediate objectives are set out in line with Recommendation No ESRB/2013/1 of the European Systemic Risk Board of 4 April 2013 on intermediate objectives and instruments of macro-prudential policy.

The **third intermediate objective** is to limit direct and indirect exposure concentrations. Direct concentration risk typically arises from significant exposures to, for example, households, general government, or certain sectors of the economy. Indirect exposures arise from the interconnectedness of financial and non-financial institutions. Elevated concentration is a long-standing structural feature of the domestic financial sector. This is largely attributable to the structure of the Slovak economy, which is heavily dependent on a small number of sectors, as well as to the concentration of bank's claims on and/or sources of funding from certain customers or groups of customers. Another significant feature of the Slovak banking sector is the high share of domestic government bonds in banks' balance sheets.

The **fourth intermediate objective** aims to limit the systemic risk arising from misaligned incentives of financial institutions and their customers. The primary aim here is to reduce the risk of moral hazard related to the presence of systemically important financial institutions. Whereas, in respect of the third intermediate objective, concentration risk is monitored for its potential impact on individual banks or the banking sector, in the case of systemically important institutions concentration is monitored owing to the large impact that potential default of such an institution would have on the financial sector and real economy. Moral hazard may also arise in relation to management remuneration at financial institutions or in the terms of cooperation with financial intermediaries.

The **fifth intermediate objective** is to strengthen the resilience of financial infrastructures. The most important elements of the financial infrastructure in Slovakia are the payment systems (TARGET2, SIPS), the Deposit Protection Fund, and securities settlement systems. Their reliable operation is crucial for the country's financial stability.

The Quarterly Commentary on Macroprudential Policy (QCMP) is structured according to these objectives, pursuant to Recommendation ESRB/2013/1. Its main part is a situation analysis (based on the indicators in the annex), which is a basis for NBS decision-making. This edition of the QCMP is based mostly on data as at 31 March 2018, although the qualitative assessment also takes account of information available until the submission date of the QCMP.

The document is divided into three parts. The first part contains a brief analysis of the most significant developments related to systemic risk which occurred during the quarter under review, broken down into sub-headings that correspond to the above-mentioned intermediate objectives. The second part, focusing on decisions taken in the area of macroprudential policy, includes not only decisions of NBS, but also decisions of the ECB. The third part comprises annexes that include: tables showing indicators used to monitor the intermediate objectives, and reference information for decisions on the countercyclical capital buffer rate.

1 Situation analysis by Národná banka Slovenska

1.1 Excessive credit growth and leverage

The credit market³ situation in the first quarter of 2018 was characterised by the continuation of trends related to the still expansionary phase of the financial cycle. Annual credit growth was close to double-digit levels, and although growth in both credit to households and credit to non-financial corporations (NFCs) had been decelerating since summer 2017, Slovakia remained among the EU countries with the highest rates of household credit growth and NFC credit growth. In both the euro area and EU as a whole, total credit to the private non-financial sector increased in the first quarter of 2018 by 1.3% year on year, while in central and eastern European (CEE) countries it increased by 5.3% on average, and in Slovakia by 9.2%. In absolute terms, the year-on-year growth in credit to the Slovak private sector remained close to historical highs. Factors stoking credit demand remain present in the economy, including low interest rates, a favourable labour market situation, growth in household disposable income, sales growth, strong competition in the credit market, and trends in the property market and in economic sentiment. The private non-financial sector debt-to-GDP ratio (measured as amount of domestic loans in comparison with GDP) rose to 59.8% in the first quarter, which was the second highest figure among CEE countries. Ten years ago, by contrast, Slovakia was among the least indebted countries in the CEE region.

Total domestic bank credit to Slovak households increased in the first quarter of 2018 by 11.3%⁴ (after rising by 11.8% in the fourth quarter of 2017). Double-digit year-on-year increases were observed in total housing loans and total consumer loans, although in both cases the growth was slightly lower compared with its rate in the summer of last year. This slowdown in credit growth is probably related to the gradual saturation of the market and partly also to the impact of recent NBS measures related to the retail lending market. There is also an increasingly noticeable base effect, as the steady expansion in the stock of loans at close to record year-on-year levels is causing a gradual decline in the rate of credit growth. Household credit growth in Slovakia was the second highest in the EU in the first quarter of 2018. Credit growth also continues to be supported by favourable macroeconomic developments (and especially their impact on the labour market and wage growth), low interest rates, and positive household sentiment. Credit growth is being reflected in household debt growth, and at the end of the first quarter of 2018 the household credit-to-GDP ratio was 39%.

Total NFC credit increased in the first quarter of 2018 by 5.5% year on year. In this sector, too, credit growth has decelerated since summer 2017, but it remains far above the EU average (0.7% in the first quarter). Most of the recent growth in NFC credit is accounted for by investment loans. Credit demand continues to be stoked by rising corporate sales, low interest rates, and a stable economic outlook. The rate of NFC credit growth in Slovakia was among the five highest in the EU in the first quarter of 2018. The NFC debt-to-GDP ratio in Slovakia was 20.8% in the period under review.

³ Loans provided by domestic banks to the household sector (S.14 and S.15) and the NFC sector (S.11) in Slovakia (source: Statement V (NBS) 33 - 12).

⁴ Total credit adjusted for the impact of a methodological change arising from the acquisition of the non-bank Consumer Finance Holding, a.s. by Všeobecná úverová banka, a.s. with effect from 1 January 2018. The rate of credit growth not adjusted for this change would be 9.9%.

Further evidence that the cycle is in an expansionary phase was provided by indicators gauging developments in the credit and financial markets. These indicators fell slightly, reflecting a slowdown in credit growth at the turn of the year. Nevertheless, benchmark indicators have for the past several quarters been implying a higher setting of the countercyclical capital buffer (CCyB) rate than that actually applied. The domestic credit-to-GDP_{trend} gap⁵ edged down in the first quarter of 2018 by 0.07 p.b., to 5.12, and the buffer guide based on this indicator fell slightly, to 1.5%. The Cyclogram, a composite indicator of the financial cycle, also fell moderately in the first quarter, reflecting slowdowns in NFC credit growth and property price growth, and a decline in the confidence indicator. On the other hand, another component of the Cyclogram, debt indicators, continued to have a positive impact. The current level of the Cyclogram remains close to its historical highs of summer 2008, and the buffer guide based on this indicator currently stands at 2.25%.

1.2 Excessive maturity mismatch and market illiquidity

The nature of systemic liquidity risk in the Slovak banking sector remained unchanged in the first quarter of 2018. The continuing growth in retail loans continued to increase the maturity mismatch between assets and liabilities, while the share of investments in liquid assets fell slightly. The ratio of the liquidity gap to total assets reached a new historical high. At the same time, however, the moderate easing of NFC credit growth, together with deposit trends, had a stabilising effect on the loan-to-deposit ratio, which in previous quarters had been increasing continuously.

A key change in the area of liquidity occurred at the start of 2018, when the domestic regulatory liquidity coverage ratio was mandatorily replaced with an EU-wide liquidity coverage ratio. The new ratio requirement is less strict and represents for Slovak banks a loosening of liquidity risk regulation at a time of increasing cyclical risks.

1.3 Concentration

Concentration in the different types of exposure did not change significantly in the first quarter of 2018, nor did their riskiness. The non-performing loan (NPL) ratio fell in each sectoral loan portfolio apart from the portfolio of loans to the wholesale and retail trade sector, where it rose from 6.6% to 7.9%.

⁵ The indicator is based on the amount of loans provided by domestic banks to NFCs and households.

1.4 Moral hazard

Moral hazard indicators continue to show relatively high concentration in the banking sector, and so the reasons for having additional capital buffers for systemically important institutions remain in place. The concentration of total net assets in the financial system increased moderately, as did that of guaranteed deposits, retail loans, and total liabilities. The only notable decrease in concentration among assets in the financial system resulted from a reduction in certain banks' exposure to Czech members of their group.

1.5 Financial infrastructures and other risks

The rate of contributions to the Deposit Protection Fund (DPF) in 2018 was set at 0.01% of the amount of covered deposits, and these contributions were payable by 15 June 2018. Given the strong growth in the amount of covered deposits, the deposit coverage ratio is expected to remain just above 0.6% in 2018. The banking sector's total contribution to the EU's Single Resolution Fund for 2018 was set at €19 million and was also payable in the first half of 2018. The rate of the special levy payable by banks in Slovakia is set at 0.2% per annum until 2020. The cumulative proceeds of the levy amounted to €850 million by the end of the first quarter of 2018.

Two payment system failures occurred in the second quarter of 2018. In the first case, the Slovak Interbank Payment System (SIPS) experienced technical difficulties that delayed the settlement of certain payments. The second failure concerned the VISA payment system and temporarily prevented VISA customers from using their VISA cards. The company subsequently stated that the problem had been caused by a hardware failure in one of its European systems, and it also ruled out the involvement of any unauthorised access or cyber attack.

2 Decisions in the area of macroprudential policy

2.1 Decisions taken by NBS with respect to developments in the quarter under review

The NBS Bank Board decided to increase the countercyclical capital buffer (CCyB) rate to 1.5% with effect from 1 August 2019.

In taking its decision on the CCyB rate, the NBS Bank Board gave due consideration to the views of the European Central Bank (ECB) in accordance with Article 5 of the SSM Regulation.⁶

2.2 Current instrument settings

The CCyB rate is currently set at 0.50%⁷ for the period from 1 August 2017 to 31 July 2018. The CCyB rate is being increased on a phased basis as summarised in Table 1 below.

⁶ Council Regulation (EU) No 1024/2013 of 15 October 2013 conferring specific tasks on the European Central Bank concerning policies relating to the prudential supervision of credit institutions.

⁷ https://www.nbs.sk/_img/Documents/_Legislativa/_FullWordingsOther/EN_ROZ_20_2016.pdf

Table 1 CCyB rates for Slovak exposures

Period of application	Rate
1 August 2017 – 31 July 2018	0.50%
1 August 2018 – 31 July 2019	1.25%
1 August 2019	1.50%

On 29 May 2018 the NBS Bank Board approved a Decree amending the NBS Consumer Loan Decree⁸ and a Decree amending the NBS Housing Loan Decree.⁹ The new decrees tighten the regulatory loan-to-value (LTV) ratio limits. Thus, the provision of loans with an LTV ratio greater than 90% is prohibited, and the percentage of new loans that may have an LTV ratio of between 80% and 90% is reduced. In addition, the Decrees introduce a debt-to-income (DTI) ratio limit, set at 8. A general exemption from this limit is permitted and a specific exemption for young people is also permitted, with each exemption to be set at 5% of total new loans per quarter. The amending Decrees entered into force on 1 July 2018, and the exemptions will be phased in until 1 January 2019.

Under Decision Nos 5/2017 and 6/2017 of Národná banka Slovenska of 30 May 2017, banks in Slovakia identified as ‘other systemically important institutions’ (O-SIIs) are required from 1 January 2018 to maintain a total additional capital buffer (comprising an O-SII buffer and in some cases also a systemic risk buffer) of between 1% and 2% of risk-weighted exposures. Under NBS Decision Nos 4/2018 and 5/2018 of 29 May 2017, the total additional capital buffer requirements will remain unchanged from 1 January 2019.¹⁰

Other currently applicable macroprudential policy instruments, covering mainly the area of capital requirements, are listed in **Error! Reference source not found.**

2.3 Potential application of macroprudential policy instruments in the medium term

Retail lending

Since ‘pre-approved’ loans are statutorily exempt from the provisions of the NBS Consumer Loan Decree, they could to some extent be used to circumvent the new regulatory requirements. These are loans whose amounts are approved by banks in advance, even before a loan application is made, on the basis of whether the borrower meets certain financial and non-financial criteria. Such loans are not currently subject to any financial buffer requirement or DTI ratio limits. NBS is planning to

⁸ Decree No 6/2018 of Národná banka Slovenska of 29 May 2018 amending Decree No 10/2017 of Národná banka Slovenska laying down detailed provisions on the assessment of borrowers’ ability to repay consumer loans.

⁹ Decree No 7/2018 of Národná banka Slovenska of 29 May 2018 amending Decree No 10/2016 of Národná banka Slovenska laying down detailed provisions on the assessment of borrowers’ ability to repay housing loans.

¹⁰ https://www.nbs.sk/_img/Documents/_Dohlad/Makropolitika/4-2018.pdf and https://www.nbs.sk/_img/Documents/_Dohlad/Makropolitika/5-2018.pdf

change the current regulatory rules so that these criteria are applied to all consumer loans, including pre-approved loans.

Expected developments in the CCyB rate in the next quarter

Current indicator trends do not imply any immediate need to increase the CCyB rate in the next quarter.

2.4 ECB decisions concerning the Slovak banking sector

As of 26 June 2018 the European Central Bank had not issued any macroprudential policy decision concerning the Slovak banking sector.

Table 1 Current setting of instruments applicable in Slovakia

Macroprudential instruments	Q3 2017	Q4 2017	Q1 2018	Q2 2018	Q3 2018	Note
Macroprudential instruments applicable in Slovakia						
Capital conservation buffer (Article 33b of the Banking Act)	2.5%	2.5%	2.5%	2.5%	2.5%	
Countercyclical capital buffer rate (Article 33g of the Banking Act)	0%	0.5%	0.5%	0.5%	1.25%	To be increased to 1.25% since 1 August 2018 and to 1.5% since 1 August 2019.
O-SII buffer (Article 33d of the Banking Act) ¹¹	1% - 2%	1% - 2%	0.5% - 1%	0.5% - 1%	0.5% - 1%	
Systemic risk buffer (Article 33e of the Banking Act) ¹²	1%	1%	1%	1%	1%	
Risk-weight for exposures fully secured by mortgages for residential property (Article 124 of the EU's Regulation on prudential requirements for credit institutions and investment firms –hereinafter "the CRR")	35%	35%	35%	35%	35%	
Risk-weight for exposures fully secured by mortgages on commercial immovable property (Article 124 of the CRR)	50%	50%	50%	50%	50%	Scheduled increase.
Minimum exposure-weighted average LGD for all retail exposures secured by residential property and not benefiting from guarantees from central governments (Article 164 of the CRR)	10%	10%	10%	10%	10%	
Minimum exposure-weighted average LGD for all retail exposures secured by commercial immovable property and not benefiting from guarantees from central governments (Article 164 of the CRR)	15%	15%	15%	15%	15%	
Risk-weight for exposures fully secured by mortgages on commercial immovable property - other EU Member States (Article 124 of the CRR)	50%	50%	50%	50%	50%	
Minimum exposure-weighted average LGD for all retail exposures secured by residential property and not benefiting from guarantees from central governments - other EU Member States (Article 164 of the CRR)	10%	10%	10%	10%	10%	
Minimum exposure-weighted average LGD for all retail exposures secured by commercial immovable property and not benefiting from guarantees from central governments - other EU Member States (Article 164 of the CRR)	15%	15%	15%	15%	15%	

Source: NBS.

¹¹ O-SII buffer is set for Československá obchodná banka, a.s., Poštová banka, a.s., Slovenská sporiteľňa, a.s., Tatra banka, a.s. and Všeobecná úverová banka, a.s.

¹² Systemic risk buffer is set for Slovenská sporiteľňa, a.s., Tatra banka, a.s. and Všeobecná úverová banka, a.s.

Table 2 Current setting of instruments applicable to foreign exposures

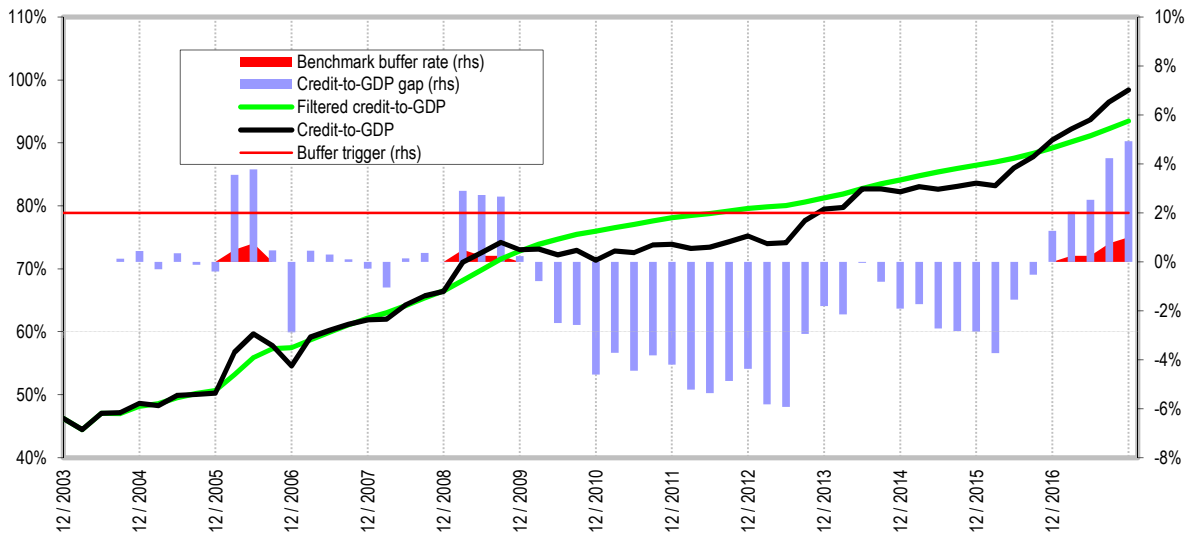
Macroprudential instrument	Q3 2017	Q4 2017	Q1 2018	Q2 2018	Q3 2018	Note
Macroprudential instruments applicable abroad						
Countercyclical capital buffer rate for Czech Republic (Article 33j of the Banking Act)	0.5%	0.5%	0.5%	0.5%	1%	To be increased to 1.0% from 1 July 2018 and to 1.25% from 1 January 2019 and to 1,5% from 1 July 2019.
Countercyclical capital buffer rate for Sweden (Article 33j of the Banking Act)	2%	2%	2%	2%	2%	
Countercyclical capital buffer rate for United Kingdom (Article 33j of the Banking Act)	0%	0%	0%	0.5%	0.5%	To be increased to 1% from 28 November 2018.
Countercyclical capital buffer rate for Lithuania (Article 33j of the Banking Act)	0%	0%	0%	0%	0%	To be increased to 0.5% from 31 December 2018.
Countercyclical capital buffer rate for Denmark (Article 33j of the Banking Act)	0%	0%	0%	0%	0%	To be increased to 0.5% from 31 March 2019.
Countercyclical capital buffer rate for other EU Member States (Article 33j of the Banking Act)	0%	0%	0%	0%	0%	
Countercyclical capital buffer rate for Norway (Article 33j of the Banking Act)	1.5%	2%	2%	2%	2%	
Countercyclical capital buffer rate for Iceland (Article 33j of the Banking Act)	1%	1.25%	1.25%	1.25%	1.25%	To be increased to 1.75% from 15 May 2019.
Countercyclical capital buffer rate for Hong Kong (Article 33i and Article 33j of the Banking Act)	1.25%	1.25%	1.875%	1.875%	1.875%	To be increased to 2.5% from 1 January 2019.
Countercyclical capital buffer rate for countries other than EU Member States (Article 33i and Article 33j of the Banking Act)	0%	0%	0%	0%	0%	
Systemic risk buffer for Estonia (Article 33f of the Banking Act)	1%	1%	1%	1%	1%	
Systemic risk buffer for other EU Member States (Article 33f of the Banking Act)	0%	0%	0%	0%	0%	
Risk-weight for exposures fully secured by mortgages on residential property - other EU Member States (Article 124 of the CRR)	35%	35%	35%	35%	35%	Ireland, Croatia, Malta, Slovenia: conditions to be tightened for application of the 35% risk weight Romania: conditions to be tightened for application of the 50% risk weight United Kingdom: conditions to be tightened for application of the 50% risk weight
Risk-weight for exposures fully secured by mortgages on commercial immovable property – Sweden and Romania (Article 124 of the CRR)	100%	100%	100%	100%	100%	
Risk-weight for exposures fully secured by mortgages on commercial immovable property - other EU Member States (Article 124 of the CRR)	50%	50%	50%	50%	50%	
Minimum exposure-weighted average LGD for all retail exposures secured by residential property and not benefiting from guarantees from central governments - other EU Member States (Article 164 of the CRR)	10%	10%	10%	10%	10%	
Minimum exposure-weighted average LGD for all retail exposures secured by residential property and not benefiting from guarantees from central governments – Norway (Article 164 of the CRR)	20%	20%	20%	20%	20%	
Minimum exposure-weighted average LGD for all retail exposures secured by commercial immovable property and not benefiting from guarantees from central governments - other EU Member States (Article 164 of the CRR)	15%	15%	15%	15%	15%	

Source: ESRB.

B) Countercyclical capital buffer

Deviation of the credit-to-GDP ratio from its long-term trend¹³

Chart 1 Credit-to-GDP gap



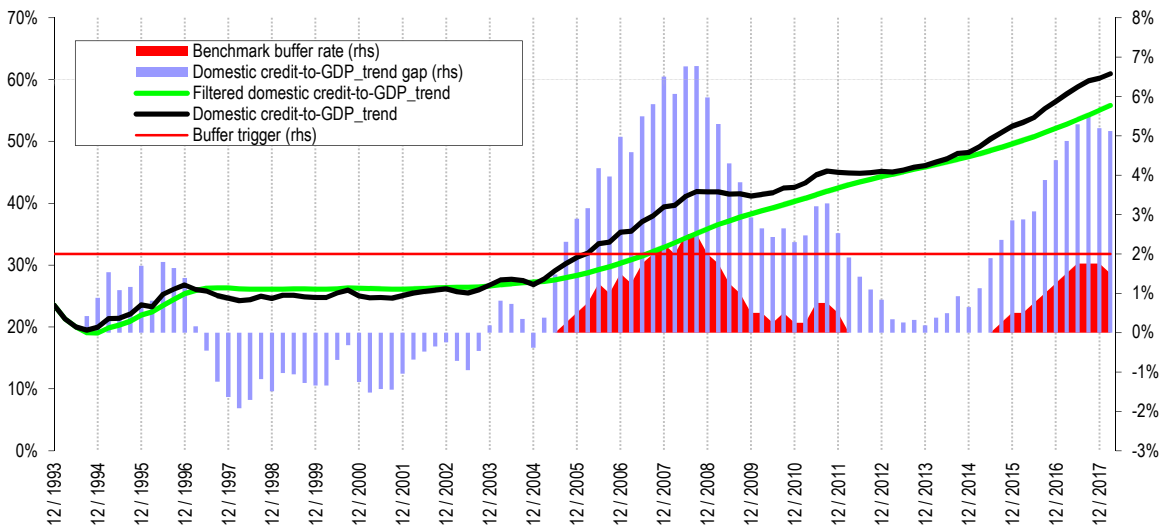
Source: NBS, SO SR.

Credit-to-GDP gap is estimated on outstanding amount of debt of NFCs and households.

Countercyclical capital buffer trigger values and gap values are shown on the right-hand scale.

Due to revised data on NFC debt against NFC sector (sector S11 against S11) for Q3 2017, level of the Credit-to-GDP gap indicator as well as level of buffer guide was slightly revised in Q3 2017.

Chart 2 Domestic credit-to-GDP_{trend} gap¹⁴



Source: NBS, SO SR.

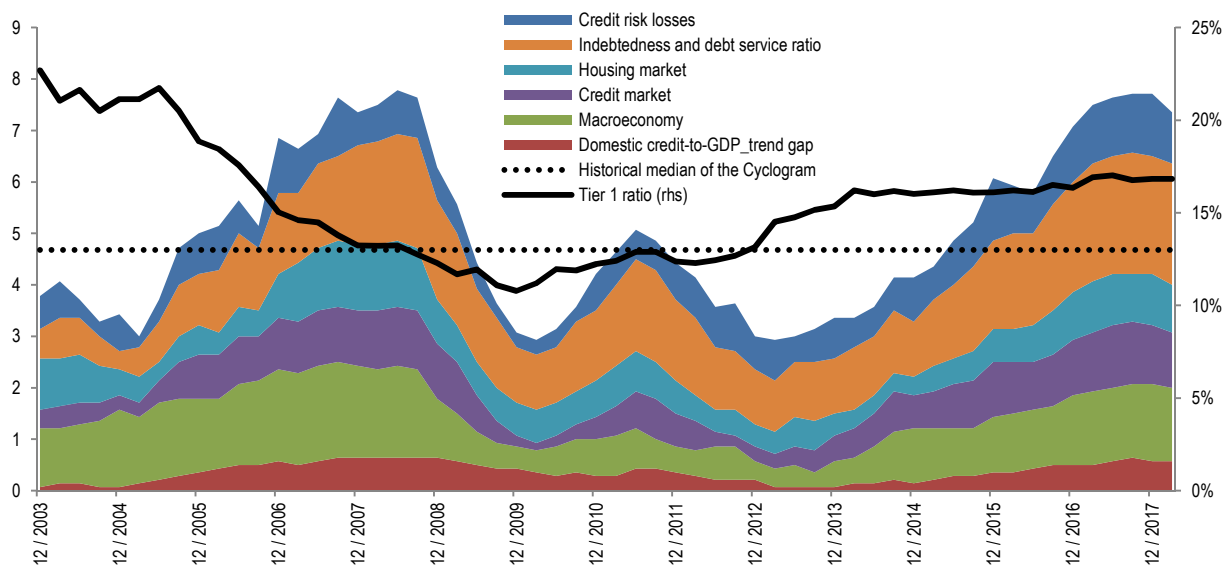
Domestic credit-to-GDP gap is estimated on credit provided by domestic banking sector to NFCs and households.

Countercyclical capital buffer trigger values and gap values are shown on the right-hand scale.

¹³ The buffer guide calibration made in accordance with with ESRB Recommendation No ESRB/2014/1 of 18 June 2014, Annex, Part II.

¹⁴ Ratio pursuant to Article 33g(2)(a) of the Banking Act; calculation made in accordance with ESRB Recommendation No ESRB/2014/1 of 18 June 2014 on guidance for setting countercyclical buffer rates, part B2.

Chart 3 Cyclogram¹⁵



Source: NBS, SO SR and CMN.

Table 3 Buffer guide for the countercyclical capital buffer as at 31 March 2018*

Indicator	Buffer guide	Debt/GDP ratio	Deviation of the credit-to-GDP ratio from its long-term trend
Credit-to-GDP gap* (Chart 1)	1.00%	98.4%	4.93%
Domestic credit-to-GDP _{trend} gap (Chart 2)	1.50%	59.8%	5.12%
Cyclogram (Chart 3)	2.25%		

Source: NBS.

Note: Due to the shortage of time series, the Credit-to-GDP gap indicator does not actually perform as a reliable buffer guide indicator.

* As data on the total debt of the private sector for the 1Q 2018 were not available to the July countercyclical capital buffer approval date, the Standard Credit-to-GDP gap data in the table is calculated on 4Q 2017 data.

¹⁵ Pursuant to Article 33g(1c) of the Banking Act; calculation made in accordance with ESRB Recommendation No ESRB/2014/1 of 18 June 2014 on guidance for setting countercyclical buffer rates, parts C and D.