Supranational Banking Supervision, Credit Supply and Risk-Taking: European Evidence from Multi-Country Credit Registers

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This Paper: Heterogeneous Effect of Supranational Banking Supervision

This paper: the effect of supranational banking supervision on credit supply and bank risk taking

• how does supranational supervision affect credit supply and bank risk taking?

Paper relies on:

- multi-country credit registers (AnaCredit)
- introduction of the Single Supervisory Mechanism (SSM): a shift from national to supranational supervision for the largest EU banks in November 2014

Main result: heterogenous effect of supranational supervision

- In stressed countries (Italy, Portugal, and Spain): supranational supervision increases the supply of credit and limits bank risk taking
- In non-stressed EU countries: supranational supervision reduces the supply of credit
- Explanation of this heterogenous effect across countries using proxies for the country's "initial condition" before treatment.

Methodology: Difference-in-Differences

Dependent variable: total credit granted by bank b to firm f at time t

$$\begin{array}{ll} \textit{Credit}_{\textit{bft}} & = & \alpha^{\textit{FE}} + \delta \textit{Sup}_{\textit{bt}} + \theta \textit{High-risk firm}_{\textit{ft}-1} \\ & + \beta \textit{High-risk firm}_{\textit{ft}-1} \times \textit{Sup}_{\textit{bt}} + \epsilon_{\textit{bft}} \end{array}$$

where

$$Sup_{bt} = Treated_b \times Post_t = \begin{cases} 1 & \text{if } b \in SSM \text{ and } t \geq November 2014 \\ 0 & \text{otherwise} \end{cases}$$

Treatment assignment ($b \in SSM$) based on size thresholds, and $High\text{-}risk\,firm_{ft-1}$ is a measure of firm risk $\in [0,1]$.

Main results:

- In stressed countries (Italy, Portugal, and Spain): supranational supervision increases the supply of credit and limits bank risk taking ($\delta>0$ and $\beta<0$)
- In non-stressed EU countries: supranational supervision reduces the supply of credit ($\delta < 0$ and $\beta \approx 0$).

Main Results (1)

Credit_{bft} =
$$\alpha^{FE} + \delta Sup_{bt} + \theta High$$
-risk firm_{ft-1}
+ $\beta High$ -risk firm_{ft-1} × $Sup_{bt} + \varepsilon_{bft}$

	Credit			
·	Stressed Countries		Non-Stressed Countries	
	(1)	(2)	(3)	(4)
Sup _{b,t-1}	0.0532***	0.07956***	-0.0601***	-0.091***
	(0.0053)	(0.0066)	(0.0071)	(0.0101)
High-Risk Firm _{f,t-1}	0.0591***		0.0324*	
8,	(0.0126)		(0.0182)	
Sup _{b,t-1} x High-	-0.2620***	-0.1337***	-0.2107***	-0.0294
Risk Firm _{f,t-1}	(0.0151)	(0.0250)	(0.0186)	(0.0323)
Bank-Firm FE	Yes	Yes	Yes	Yes
Sector-Time FE	Yes	-	Yes	-
Firm-Time FE	No	Yes	No	Yes
N	40,621,335	30,660,006	6,788,681	3,567,331
Pseudo R ²	0.955	0.960	0.948	0.960

Main Results (2): Country Heterogeneity

$$\begin{array}{ll} \textit{Credit}_{\textit{bft}} & = & \alpha^{\textit{FE}} + \delta \textit{Sup}_{\textit{bt}} + \delta^* \textit{Sup}_{\textit{bt}} \times \textit{Proxy}_{\textit{c}(f)} + \theta \textit{High-risk firm}_{\textit{ft}-1} \\ & + \beta \textit{High-risk firm}_{\textit{ft}-1} \times \textit{Sup}_{\textit{bt}} \\ & + \beta^* \textit{High-risk firm}_{\textit{ft}-1} \times \textit{Sup}_{\textit{bt}} \times \textit{Proxy}_{\textit{c}(f)} + \epsilon_{\textit{bft}} \end{array}$$

where $Proxy_{c(f)}$ increases with:

- weaker controls for corruption ("corruption")
 - using country and regional level indices for institutional quality
 - Assumption: supranational supervision reduces supervisory leniency in countries with lower controls for corruption.
- bank size (GSIB), firm's sector employment share (supervisory "incentives")
 - Assumption: national supervisors are more lenient towards their large domestic banks, and firms in industries that employ a large share of the national workforce.
- low national supervisory ability (supervisory "ability")
 - Assumption: greater ability of supranational supervisors who have "access to a broader pool of knowledge".

Main result: $\delta^* > 0$ and $\beta^* < 0$ (same result as for stressed countries).

My Comments

This paper documents an increase in credit supply and a reduction in risk taking in EU stressed countries following the transition to supranational banking supervision.

Comment 1: Interpretation of the treatment

supranational or stricter supervision?

Comment 2: Measuring "corruption", "incentives", and "ability" of national supervisors

measurement error and omitted variable bias

Comment 3: Global vs. local supervision trade-off

Comment 1: Supranational or Stricter Supervision?

How should we interpret the treatment in the DiD?

- This paper: treatment = "change in the allocation of responsibilities between national and supranational supervisors"
- However, "policy reforms aimed at (de)centralizing supervision typically go along with explicit changes in the objectives of supervision." (Di Gong et al., 2023)

Transition to supranational supervision in Nov 2014 or stricter supervision?

- 26 October 2014: Asset Quality Review (AQR) and EU-wide stress test
 - clear intent of cleaning the balance sheets of the largest banks
 - more stringent capital requirements in the background
 - stricter supervision of largest banks because of implicit gvt guarantees
 - break the bank-sovereign nexus together with TLTROs, QE, etc. and reduce market fragmentation in Europe
- More resources allocated to supervision? Change in the ratio #employees in supervision/#employees in banks?

Suggestion: clarify the treatment definition.

 use data from AQR, EU stress tests, etc. to isolate a "transfer of responsibilities" effect.

Comment 2: Measuring "Corruption", "Incentives", "Abilities"

This Paper: Identification of a conditional ATT, conditional on stressed vs. non-stressed countries (relying on conditional parallel trends: Roth, et al., 2022)

Paper goes one step further: explaining how supranational affects bank risk taking

- why is the ATT different is in stressed vs. non stressed countries?
- "due to national supervisory biased incentives, lower national supervisors' ability, and weaker overall domestic control of corruption"

Proxies: measurement error and omitted variable bias

- measurement error: "corruption", "incentives", "abilities" are unobservable.
 - "incentives" of supervisors measured with bank size, while this is typically employed for bank incentives (due to implicit gvt guarantees)
 - **2 omitted variable bias**: proxy measures a country "initial condition"
 - important controls: sovereign risk, differences in supervisory resources
 - cross section of 9 countries

Suggestions:

- exploit the international dimension: identify banks supervised by different national supervisors (before treatment) lending to the same firm.
- build IVs for country-level variables: e.g., GIV, Bartik instruments.

Comment 3: Global vs. Local Supervision Trade-off

Global vs. local supervision: what are the trade-offs at work?

- Local supervisors may have incentives to be more "lenient" toward local banks and firms
 - have incentives to preserve jobs in their jurisdiction (in banks and non-financial firms)
 - they might have political interests
 - they may not internalize the consequences of their actions outside their regulatory perimeter
 - Agarwal et al. (2014): Federal regulators are tougher than state regulators.
- Local supervisors may have an informational advantage
 - Information collection is more difficult for central supervisors due to physical distance to the supervised banks (Repullo, 2018; Colliard, 2020)
 - Haselmann et al., 2022: SSM supranational supervision is associated with a loss in information in banks' risk models
 - Di Gong et al. (2023): a shift toward local supervision in China increases the number of enforcement actions, resulting in more conservative lending.

Summary

This paper documents an increase in credit supply and a reduction in risk taking in EU stressed countries following the transition to supranational banking supervision (identification of a conditional ATT).

Comment 1: Interpretation of the treatment

• supranational (i.e., "transfer of responsibilities") or stricter supervision?

Comment 2: Measuring "corruption", "incentives", and "ability" of national supervisors

measurement error and omitted variable bias

Comment 3: Global vs. local supervision

• trade-off between incentives and information.