

Comments to “Effects of Bank Capital
Requirements on Lending by Banks and Non-Bank
Financial Institutions” by P. Bednarek, O.
Briukhova, S. Ongena, and N. v. Westernhagen

Andres Sagner T.

BancoEstado

Disclaimer

The opinions expressed herein are mine and do not necessarily represent the opinions of BancoEstado and its Executive Committee.

Summary

- ▶ Paper empirically investigates effects of bank capital requirements on lending activity of German banks and non-bank financial institutions (NBFIs)
 - ▶ Spillover effects of banking regulation and impacts on distribution of risks
 - ▶ Quasi-exogenous increase in bank capital requirements imposed by EBA capital exercise in October 2011

Summary

- ▶ Paper empirically investigates effects of bank capital requirements on lending activity of German banks and non-bank financial institutions (NBFIs)
 - ▶ Spillover effects of banking regulation and impacts on distribution of risks
 - ▶ Quasi-exogenous increase in bank capital requirements imposed by EBA capital exercise in October 2011
- ▶ **Main findings**
 - ▶ NBFIs and Non-EBA banks expand their corporate lending relative to EBA banks
 - ▶ NBFIs funding increase is stronger in riskier and more competitive borrower segments
 - ▶ NBFIs do not rely on bank funding to finance their expansion

Usability of Bank Capital Buffers

- ▶ Bank capital management aims to
 - ▶ Establish sufficient capital levels to support its business strategy
 - ▶ Comply with minimum regulatory requirements

Usability of Bank Capital Buffers

- ▶ Bank capital management aims to
 - ▶ Establish sufficient capital levels to support its business strategy
 - ▶ Comply with minimum regulatory requirements
- ▶ Decision to use capital buffers to (partly) absorb a lower lending activity depends on
 - ▶ Trade-off between benefits from a larger loan book and costs due to capital shortfall
 - ▶ Reduction of RWA density

Usability of Bank Capital Buffers

- ▶ Bank capital management aims to
 - ▶ Establish sufficient capital levels to support its business strategy
 - ▶ Comply with minimum regulatory requirements
- ▶ Decision to use capital buffers to (partly) absorb a lower lending activity depends on
 - ▶ Trade-off between benefits from a larger loan book and costs due to capital shortfall
 - ▶ Reduction of RWA density
- ▶ Related empirical literature is not abundant
 - ▶ [ECB \(2020a, 2020b\)](#)
 - ▶ Buffer usability leads to better economic outcomes and has little impact on banks' solvency
 - ▶ **Implementation**
 - ▶ Extend baseline specification by incorporating a measure of banks' capital buffer and RWA densities

Controls for Credit Demand

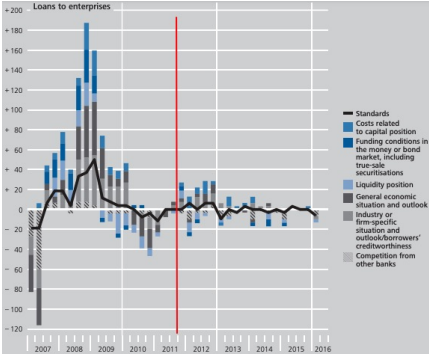
- ▶ Paper follows the approach of [Degryse *et al.* \(2019\)](#)
 - ▶ Firms combined into groups by industry, location and size characteristics
 - ▶ Within firms estimation allows for more granular controls but limits significantly the sample size

Controls for Credit Demand

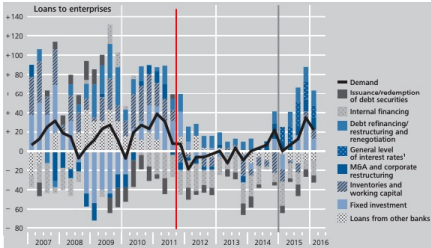
- ▶ Paper follows the approach of [Degryse *et al.* \(2019\)](#)
 - ▶ Firms combined into groups by industry, location and size characteristics
 - ▶ Within firms estimation allows for more granular controls but limits significantly the sample size
- ▶ Bank Lending Survey for Germany as an additional alternative
 - ▶ Changes in credit standards and credit demand detailed by explanatory factors and loan segments
 - ▶ [Bassett *et al.* \(2014\)](#), [Cavallo *et al.* \(2024\)](#)
 - ▶ Time-series regressions of changes in credit standards on own lags, macro-financial variables, and bank-level variables

Controls for Credit Demand

Figure: Bank Lending Survey (Deutsche Bundesbank, 2016)



(a) Changes in Credit Standards



(b) Changes in Demand

Credit Substitution

- ▶ Credit use by firms is relevant to determine the substitution degree between lenders
 - ▶ Working capital- and investment-oriented loans
 - ▶ Firms may engage with a factoring company as part of their liquidity management
 - ▶ Multi-banking firms
 - ▶ Agreements (suppliers/workers payment)
 - ▶ Type of lending contract (credit lines v/s loans)

Credit Substitution

- ▶ Credit use by firms is relevant to determine the substitution degree between lenders
 - ▶ Working capital- and investment-oriented loans
 - ▶ Firms may engage with a factoring company as part of their liquidity management
 - ▶ Multi-banking firms
 - ▶ Agreements (suppliers/workers payment)
 - ▶ Type of lending contract (credit lines v/s loans)
- ▶ Include loan characteristics in the analysis
 - ▶ Type, interest rate and term of the loan

