The Countercyclical Capital Buffer Rate

March 2018

Financial Stability Department
The Countercyclical Capital Buffer (CCyB)

In accordance with Article 136(7) of EU Directive 2013/36/EU, transposed in the Central Bank of Malta Directive 11 “Macro-prudential Policy”, the Central Bank of Malta is hereby notifying its decision on the applicable buffer rate.

**Notification**

- The applicable countercyclical capital buffer rate: 0%
- The relevant credit-to-GDP ratio: 78.1% and its deviation from the long-term trend: -25.6 percentage points.
- The buffer guide: 0%

**Analysis**

The aim of the countercyclical capital buffer (CCyB) is to safeguard the banking system from losses that could stem from the build-up of excessive credit growth that are generally associated with the build-up of systemic risk. In this regard, the CCyB is built during the upswing of the financial cycle to absorb losses that may arise in a subsequent downturn, without interrupting the supply of credit to the real economy.

The Central Bank of Malta assesses variables related to private sector lending and other banking sector indicators with the aim to decide on the need to activate this buffer. This note provides the rationale for the proposed buffer rate to be set at 0%. The main indicator backing this proposal is the deviation of credit-to-GDP ratio from its long-term trend but the analysis is further supplemented by a sub-set of additional quantitative indicators and expert judgement.

**Indicators used in the assessment of the countercyclical capital buffer rate**

Based on the Basel Committee on Banking Supervision (BCBS) Guidance for the calculation of the CCyB, Chart 1 illustrates the results of the one-sided Hodrick-Prescott (HP) filter of the

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1. The analysis is based on the guidelines issued by the European Systemic Risk Board (ESRB) and Bank of International Settlements (BIS) as well as the experience of relevant international and European authorities.
2. ESRB/2014/1 - Recommendation on the Guidance for Setting Countercyclical Buffer Rates.
credit-to-GDP ratio for Malta. The trend represents the smoothed version of the actual series of the ratio of credit-to-GDP, both plotted on the left-hand axis. The gap between the two is reflected in the light blue histogram which is plotted on the right-hand axis.

In the last quarter of 2017, the credit-to-GDP ratio narrowed to 25.6 pp below the trend. Nevertheless the gap remains significantly in negative territory with the CCyB rate of zero still remaining appropriate. Furthermore, historical developments indicate that the narrowing of the gap is expected to take several quarters before it returns to positive territory.

Credit Growth

Resident credit grew by 2.7% in December 2017, largely driven by mortgages which went up by 8.2%, as otherwise lending to NFCs fell by -1.1%. Such contraction in NFC lending in part reflects an element of disintermediation, whereby some NFCs tapped the capital market for their funding requirements or relied on internal funds for financing their operations. Consumer credit growth also continued to contract, falling by 4.2% (see Chart 2).

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3 Credit represents total bank credit. CRD IV Article 136 (2a) states that “an indicator of growth of levels of credit within that jurisdiction” shall be used by the Authority. Although Drehmann (2013) showed that credit gaps based on total credit outperform those based on bank credit as early warning indicators for banking crises, this might not be so relevant for Malta given that the domestic economy is strongly reliant on bank credit and therefore the use of total bank credit is highly appropriate for this purpose. Furthermore, the time series for total credit contains breaks in the data over time, which could lead to unreliable estimations.
Property prices in Malta rose in recent years reflecting the robust economic activity. The growth in transacted property prices peaked in the third quarter of 2015 at 8.6% compared to a year earlier, but decelerated thereafter reaching 4.1% by the third quarter of 2017. House prices grew at a more modest rate than nominal GDP which rose by 9% in 2017. Although the median advertised property price-to-income ratio increased since mid-2015, it remained well below its peak in 2006 and lower than its average since 2000 (see Chart 3).
The conservative haircuts and relatively low loan-to-value ratios applied by banks help to mitigate potential vulnerabilities that could stem from the real estate market. Moreover, delinquency rates on mortgages have traditionally been low and on a decreasing path, whereas household disposable income is growing at a healthy pace as economic activity remains strong. Overall, financial stability risks stemming from the housing market remain low and contained.

Household and Corporate Debt

While both household and corporate indebtedness increased in absolute terms, up by 5.8% and 5.1%, respectively, these dropped somewhat when expressed as a percentage of GDP (see Chart 4). Household debt decreased to 49.9% of GDP in September 2017, below the euro area average notwithstanding the high home-ownership rate which stands at around 80%. Households continued to accumulate wealth, with their net financial wealth expanding by 2.8% in Q3 2017 to 164.6% of GDP. The increase in net financial wealth mainly stemmed from higher holdings of cash and deposits, which remained the largest share of the households’ financial wealth.

In September 2017, corporate debt-to-GDP dropped to 133.9% compared to the 138.2% in end-2016. Given that almost half of NFC debt consists of inter-company debt, on a consolidated basis, NFC indebtedness stood at 70.3% of GDP - lower than the euro area average. Furthermore, NFCs have a strong financial position with financial assets significantly exceeding their debt.
Current Account

On the external front, the current account surplus widened further to reach 11.5% of GDP in September 2017, indicating that Malta is not currently resorting to external debt financing (see Chart 5).

The core domestic banks remained resilient and profitable with capital ratios above their regulatory requirements together with ample liquidity and stable funding. All the relevant quantitative and qualitative information assessed were judged to convey strong indications that at the current juncture, the CCyB rate for Malta should continue to be set at zero. The standardised bank credit-to-GDP gap is currently negative at -25.6pp, which is well below the lower reference threshold of 2pp indicated in the BCBS guidance.