The Countercyclical Capital Buffer Rate

June 2018
Financial Stability Department
The Countercyclical Capital Buffer (CCyB)

In line 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: 78.7% and its deviation from the long-term trend: -23.6 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, which is 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%.\(^1\) 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.\(^2\)

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 first quarter of 2018, the credit-to-GDP ratio narrowed to 23.6 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 growth accelerated, up by 4.3% in December 2017, supported by mortgage lending and a positive growth in NFC credit. Following years of negative growth, NFC credit rose by 0.8% year-on-year. Mortgages rose by 7.9%, as otherwise consumer credit growth continued to contract, though at a slower pace, down by 3.3% (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 fourth quarter of 2017. House prices grew at a more modest rate than nominal GDP which rose by 9.1% 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 the still 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 trend, whereas households' 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 households' and corporate indebtedness increased in absolute terms, up by 5.4% and 6.0%, respectively, these dropped somewhat when expressed as a percentage of GDP (see Chart 4). Household debt decreased to 49.9% of GDP in December 2017, below the euro area average notwithstanding the high home-ownership rate which stands at around 81%. Households continued to accumulate wealth, with their net financial wealth expanding by 0.8% in December 2017 to 160.0% 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 December 2017, corporate debt-to-GDP dropped to 133.5% compared to the 138.1% in end-2016. Given that almost half of NFC debt consists of inter-company debt, on a consolidated basis, NFC indebtedness stood at 69.6% of GDP - lower than the euro area average. Furthermore, NFCs have a strong financial position with financial assets significantly exceeding their debt.

![Chart 4: Household and Corporate Debt to GDP (per cent)](chart.png)

Sources: Central Bank of Malta, NSO.
Current Account

On the external front, the current account surplus widened further to reach 12.5% of GDP in December 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 -23.6pp, which is well below the lower reference threshold of 2pp indicated in the BCBS guidance.