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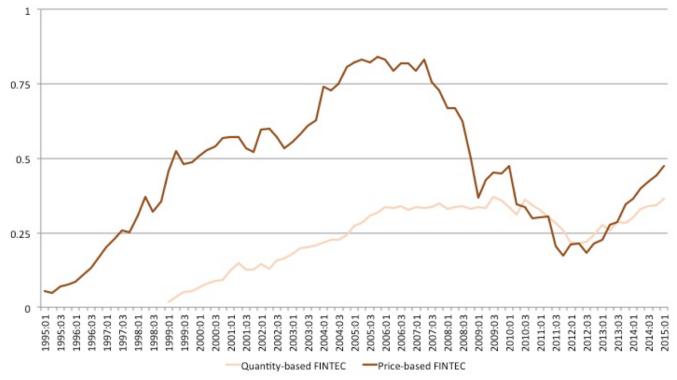
Highlights

- 226 pages with over 120 charts and tables
- 36 Cross-border barriers to capital market integration
- □ 33 Policy Recommendations
- Coverage of the whole financial sector
- Focus on financial integration policies
 - Barrier removal plan
- Differences with Banking Union
 - Whole European Union
 - Strengthening current institutional framework
 - No public risk sharing
 - No 'trigger event'

Integration after the financial crisis

Price with no quantity (holdings) convergence?

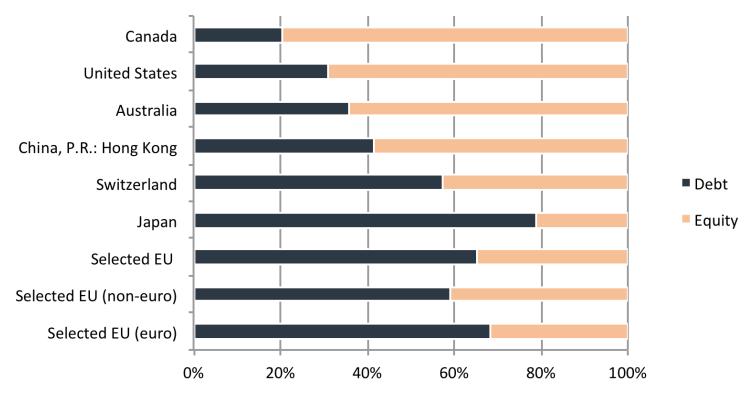
Price-based and quantity-based FINTEC (1995-2015)



Source: ECB.

Investment flows

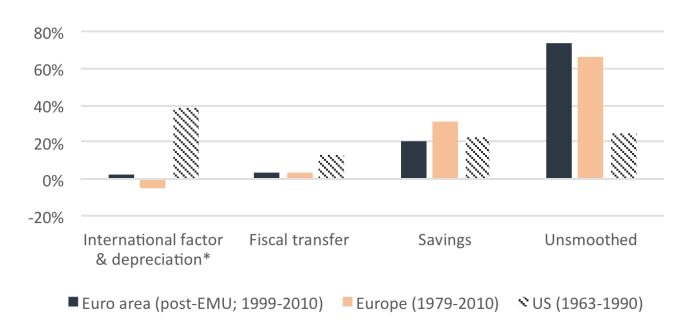
Total debt & equity portfolio investment (average 2001-2014; % total)



Source: Author's elaboration from CPIS-IMF. Note: 'Selected EU' countries include Germany, France, Italy, Spain, The Netherlands, United Kingdom, Sweden, Poland. No 2014 data for Sweden and Australia. 'Euro' means cross-border flows towards Euro area countries. 'Non-euro' means cross-border flows towards non-Euro area countries (including flows from the rest of the world).

Risk sharing

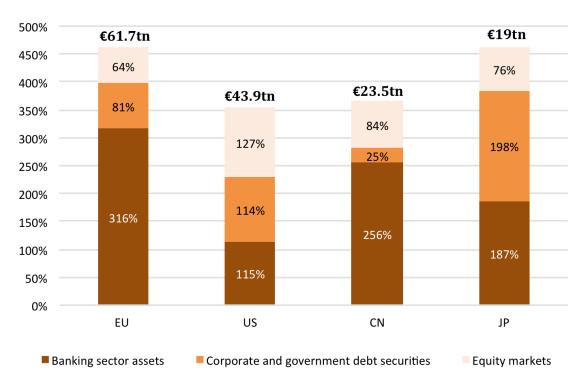
Channels of output smoothing in Europe and US



Source: Based on Furceri & Zdzienicka (2013) and Asdrubali et al. (1996). Note: *This includes factor income flows and capital depreciation output produced in part by international financial flows (including capital markets, credit markets and FDI). It is the difference between gross domestic product (GDP) and gross national product (GNP), minus the difference between GNP and Net Income (NI). This number may, however, underestimate the contribution of capital markets (including secondary trading activities), which also contribute to the GNP.

Risk sharing

Simplified structure of the financial sector in the EU (% GDP, average 2010-14)



Note: For debt securities, we use outstanding amounts and exclude financial institution debt securities (which are implicitly included in the banking sector assets statistics). For equity, we use domestic market capitalisation. For US bank assets data, we include gross notional value of derivative positions and credit union assets.

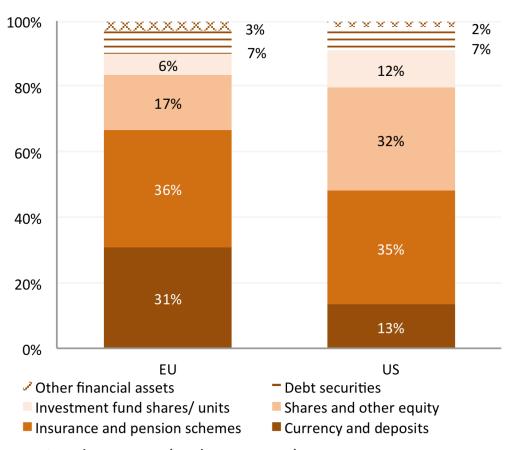
Data sources: IMF (GDP), BIS, ECB, US Fed, BoJ, PBoC, WFE, FESE, individual stock exchanges. Eurostat for exchange rates

Quality of EU financial markets

- Integration & efficiency of individual markets is poor
 - Single currency played a limited role
 - Equity markets are fairly geographically fragmented, lack depth and activity (secondary markets) with poor quality of the trading flow
 - Bond markets are OTC, but as active as equity markets
 - Private equity and venture capital are systemically insignificant
 - Private placement and securitisation are & will remain niche (the former also national and limited to banks and insurance)
- Asset management industry is fragmented and costly compared to the US
 - Cross-border and retail penetration fairly limited
- Dealer banks continue to scale down trading activities but struggle to see a successful business model
- Short-term funding costs up (SMEs struggle)

Household liquidity

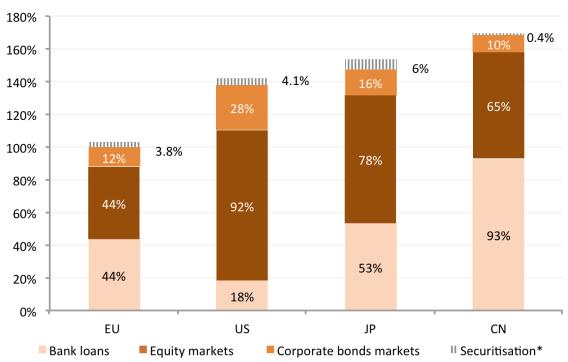
Households' financial assets in Europe and the US (% total assets; average 2007-14)



Source: ECB, Eurostat, US Fed. Eurostat (exchange rates).

NFC funding

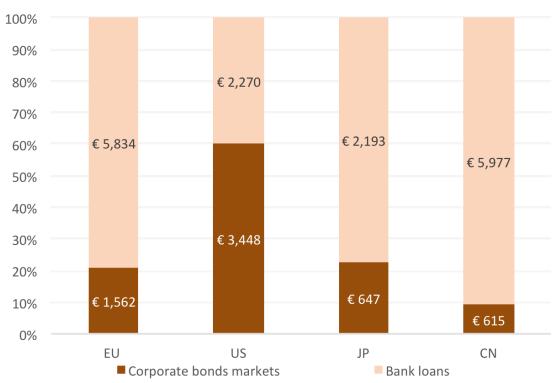
NFC bank and market intermediation % GDP [on bars], average 2010-14)



Source: IMF, Eurostat, BIS, ECB, US Fed, BoJ, PBoC, WFE, FESE, individual stock exchanges, AFME, SIFMA, CICC Research. Eurostat (exchange rates). Note: Securitisation refers to the non-financial corporate sector both in the US (CMBS) and the EU (CDO/CLO, CMBS, SME, WBS/PFI), while it includes total outstanding securitised products in JP and CN.

NFC debt funding

Market vs bank-based NFC debt funding (€bn; average 2010-14)



Source: Source: IMF, BIS, ECB, US Fed, BoJ, PBoC, WFE, FESE, individual stock exchanges. Eurostat (exchange rates). Note: for the US we use the dataset of commercial banks released by the FED, instead of the broader category of depository institutions.

Why an integration plan?

- Private risk sharing via capital markets
 - To stabilise capital flows in case of shocks from aggregate risk (cross-sectional risk sharing)
 - More market-based funding
 - More equity-based funding
- Monetary policy transmission
 - Concentration in interbank market funding
 - Market-based reference rate
- Access to finance
 - Competition among funding channels (greater choice)
 - Risk dispersion and standardisation (mid-caps)
- v. Finance for innovation
 - Equity more suitable for innovation
 - Risk dispersion and customisation (start-ups)
- V. Bank restructuring
 - Market solution to NPL?
 - Contestability of ownership and consolidation

Methodology

- Financial contracting approach
 - Contracting and renegotiation
- □ Three key areas:
 - Price discovery
 - Execution
 - Enforcement
- Cost predictability for discounting

Cost predictability in cross-border market-based financial contracting

Functions	Output	Cost predictability
Price discovery	Data	Comparability
Execution	Entry/exit requirements	Fairness
Enforcement	Rules & procedures	Certainty

Barriers – Price Discovery

	Cross-border barrier	Nature	Cost predictability	Policy outcome
		ICE DISCOVE	RY	
A.	INFORMATION ON THE UNDERLYING AS	SET		
	RS optionality for discretionary aluation models, e.g. asset retirement ligations, loan provisions, etc.	Artificial	No	Immediate action
	mestic accounting standards for non- ted companies	Artificial	No	Immediate action
	porting formats, e.g. half-yearly ports, etc.	Artificial	Yes	Action needed
me cla int or	AS optionality for alternative calculation ethodologies or definitions, e.g. assification problems, such as pension exercise in income statement as interest operating expense or calculation of bt at amortised cost or fair value	Artificial	Yes	Action needed
5. Alt	ternative performance measures	Artificial	Yes	Action needed
6. Vo	ting share disclosure threshold	Artificial	Yes	Action needed
7. Do	mestic business registries	Artificial	Yes	Action needed
	edit risk scoring and national credit reaux	Artificial	Yes	Action needed
	les on related-party transactions efinitions)	Artificial	Yes	Action needed
10. Co	mpensation disclosure (methodology)	Artificial	Yes	Action needed
11. Of	f-balance sheet items	Structural	No	Action needed
В.	FINANCIAL INSTRUMENT INFORMATION	I		
12. On (do	ngoing performance disclosure pomestic market practices)	Artificial	No	Immediate action
	it conditions disclosure (domestic arket practices)	Artificial	No	Immediate action
14. Pro	ospectus disclosure requirements	Artificial	Yes	Action needed
	Iculation methodologies for PRIIPs costs KID)	Artificial	Yes	Action needed
	arket data formats/costs & national bias securities listing	Artificial	Yes	Action needed

Barriers - Execution

	A. ENTRY PROCEDURES			
1.	Execution policies	Artificial	No	Immediate action
2.	Tax discrimination	Artificial	Yes	Action needed
3.	Local facilities, paying agents & other marketing rules	Artificial	Yes	Action needed
4.	Corporate action standards	Artificial	Yes	Action needed
5.	UCITS filing process	Artificial	Yes	Action needed
6.	Passport processing fees	Artificial	Yes	Action needed
	B. EXIT PROCEDURES			
7.	Withholding tax refund and collection procedure	Artificial	Yes	Action needed
8.	Full disclosure of exit charges and conditions	Structural	n/a	Action needed

Barriers - Enforcement

A. PUBLIC ENFORCEMENT			
1. 'Good faith' acquisitions	Artificial	No	Immediate action
2. Acquisition and disposition of securities	Artificial	No	Immediate action
3. Conflict-of-laws regime	Artificial	No	Immediate action
4. Art. 17 Breach of EU law proceedings (ESMA)	Structural	n/a	Action needed
Art. 9 consumer protection powers (ESMA)	Structural	n/a	Action needed
Sanctioning regimes (illicit profits restitution)	Artificial	Yes	Action needed
B. PRIVATE ENFORCEMENT			
7. Automatic stays	Artificial	No	Immediate action
Company's valuation in insolvency (principles)	Artificial	No	Immediate action
Secondary proceedings (conditions & deciding court)	Artificial	No	Immediate action
10. COMI for legal persons (uncertain presumption) & decentralised appeal	Artificial	No	Immediate Action
11. Gatekeepers' supervision	Structural	n/a	Action needed
12. Cross-border Alternative Dispute Resolution (ADR) mechanism (EU-wide)	Structural	n/a	Action needed

Policy recommendations - Context

- Execution could be much better...
 - Distribution channels are closed (marketing rules)
 - Static execution policies and limited ongoing disclosure
 - Cases of discrimination in tax treatment and authorisation procedures
- ...data comparability is poor...
 - Opaque internal evaluation models
 - Conflicts of interest data (e.g. RPT, cross-ownership)
 - Access and quality of company data
- ...but enforcement is worse.
 - Quality of implementation
 - Judicial review (quality of courts and ADR)
 - Weak sanctioning powers & due process

Policy recommendations - Highlights

Price discovery

- Reducing discretion in internal evaluation models (e.g. IFRS 9 'significant increase in risk' or IAS 24, 'control' definition in RPT) with 'comply-or-explain'
- Company filings and business registries
- Accounting and tax reporting
- Listing authority and national requirements (regulatory license)

2. Execution

- Uniform application of KID beyond PRIIPs
- Review of marketing rules and authorisation procedures
- Tax reclaim procedures

Policy recommendations - Highlights

Enforcement

- ESMA's review (internal)
 - Independence (e.g. appointment)
 - Representation of 'EU-wide interest' (e.g. art. 17 procedure)
- ESMA's review (external)
 - More binding powers
 - More direct supervision (through colleges and binding decisions)
 - Accounting rules, listing of UCITS, EU passport and so on
 - More exclusive competences (e.g. CCPs, ICSDs, etc)
- Network of national ombudsmen
 - Facilitate access at national level
 - Mediation powers
- Consumer agency (in ESMA)
 - To lead convergence of national laws
 - Retail market is key for diversification
- Insolvency proceedings (COMI, secondary proceedings and stays)
- Legal architecture (securities law, etc)

Conclusions

- Financial fragmentation is a destructive process
 - Macro (flows retrenchment) & micro (quality of markets)
 - Private risk sharing via markets (and equity) needed
- Focus on how to repair this process (huge upside)
- Barriers are not insurmountable
 - Plan can be spread over the years but with a firm and detailed timeline
 - Enforcement should be the priority
- Strengthening the role of ESMA in the network is inevitable
 - Start with internal governance issues and plan ahead
- Private enforcement (ADR and insolvency) has been neglected for too long...
 - ...but plan needed to improve quality of courts.