

Green Capital Requirements Martin Oehmke and Marcus Opp Discussion by Jean-Edouard Colliard 2023 ECB Banking Supervision Research Conference

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Motivation

- In the absence of a carbon tax, we have too many polluting firms.
- An alternative to carbon taxation could be to make financing of polluting firms more expensive: ESG finance / SRI (Oehmke and Opp 2019).
- But financing of firms is still mostly bank-based.
- Should we then use regulation to tilt bank portfolios towards greener firms?
- This paper considers:
 - Brown penalizing factor.
 - Green subsidizing factor.
- Conclusion is we should probably not use them.

1. The Model - Mickey Mouse Version



The Economy

Two types of loans:

- Clean: repay $1 + r_C$.
- Dirty: repay $1 + r_D > 1 + r_C$.

Economy can:

- ► Grow with probability *p*: all loans repaid.
- Enter a recession with probability 1 p: 1 q loans repaid.

• Assume
$$[p + (1 - p)q](1 + r_C) = \bar{X}_C > 1.$$

The Bank

- Bank lends L_C and L_D and finances itself with D and E, both perfectly priced. Lending L costs γ(L).
- Deposits perfectly insured by the government at no cost.
- Regulator sets risk weights <u>e</u>_C and <u>e</u>_D and capital regulation:

$$E \geq \underline{e}_C L_C + \underline{e}_D L_D$$

Bank shareholders get:

$$p \times [(1 + r_C)L_C + (1 + r_D)L_D - D] + (1 - p) \times \max[0, (1 - q)[(1 + r_C)L_C + (1 + r_D)L_D] - D] - E - \gamma(L_C + L_D)$$

Limits of the Brown Penalizing Factor

- Assume $\underline{e}_D \ge q$ and $\underline{e}_C \ge q$: bank cannot default.
- ▶ Then *D* is well priced and Modigliani-Miller holds.
- Then no matter how high <u>e</u>_D, the bank will always prefer dirty loans.
- "Brown Penalizing Factor" is not a tax: it's a removal of the deposit insurance subsidy.
- If banks are safe or deposit insurance is well-priced the impact of this factor is null.

Cost of the Green Supporting Factor

Assume <u>e</u>_D ≥ q and <u>e</u>_C < 1 − (1 − q)(1 + r_C): bank defaults if it has enough clean loans.

If only dirty loans, marginal value of a loan is:

$$\bar{X}_D - 1 - \gamma'(L)$$

If only clean loans, marginal value of a loan is:

$$\bar{X}_{C} - 1 + \underbrace{(1-p)[(1-\underline{e}_{C}) - (1-q)(1+r_{C})]}_{\text{Deposit insurance put}} - \gamma'(L)$$

- ▶ If put large enough relative to $\bar{X}_D \bar{X}_C$ then bank invests only in clean loans.
- "Green Supporting Factor" is not a regulation: it's a subsidy to clean loans via the deposit insurance fund.

Equilibrium Effects

- Not in this toy model: equilibrium effects of regulation.
- Very nice result in the paper, if bank equity is scarce:
 - Brown penalizing factor has a substitution effect: $\searrow L_D$.
 - Also an "income effect": $\sum L_D$ and $\sum L_C$.
 - If dirty firms are more profitable, banks prioritize them but have less equity to lend to clean firms: unintended consequence of brown penalizing factor is less lending to clean firms.
- BTW: "substitution effect" and "income effect" good for intuition but also a bit misleading.

2. Assessment

Strengths

- Policy messages important and powerful.
- Trade-off between more theoretical purity and more policy relevance solved rather elegantly.
- Simple framework that can be used to think about many related policy questions (extensions etc.).
- Overall I don't see much to improve upon!

One Question

- For some political reason there is no carbon tax to correct the externality.
- Hence we are in the world of the theory of the second best.
- Perhaps there is a symmetric constraint that some bank subsidies need to be maintained (political economy).
- If so, "green capital requirements" are a sort of Faustian bargain: public support to banks vs. directing credit towards socially desirable objectives.
- By the standards of banking, perhaps not such a bad bargain (compare with, e.g., Koetter and Popov 2021).

3. Going Further (not for this paper)

(More) General Equilibrium

No reason to have banks in the model, they are assumed to be the only intermediary between:

Firms.

- Households (depositors).
- More ambitious follow-up model could have:
 - Bank finance and market finance.
 - Rationale for bank finance (monitoring?), that may differ for clean and dirty firms.
- Such a model could study new and important equilibrium effects:
 - Can dirty firms substitute with market finance?
 - Are there costs of pushing clean firms towards banks?

Political Economy - 1

- Debate on Green Capital Requirements reminds me of Calomiris and Haber (2014): "the banking system is an outcome of political deal making".
- Cynical view of green capital requirements could be:
 - Middle class not ready to pay for green transition via taxes.
 - Elite allows banks to finance green transition with deposits.
 - If things go wrong middle class forced to bail-out / recapitalize banks ex post.
- Seems a very reckless move to me: imagine if the next SVB is a "green" bank.

Political Economy - 2

- I would prefer applying the Tinbergen rule:
 - Carbon tax addresses environmental externality.
 - Income tax distributes the impact more evenly.
 - Capital requirements ensure banks are solvent.
- Framework integrating banking regulation, environment, and political economy would be a great tool to think about all these issues with more discipline.

Conclusion

- First-order and robust policy take-aways.
- Nice and useful theoretical framework.
- Just a great paper.
- Touches upon even more fundamental questions in banking regulation, perhaps for future research!

Thank You!