





# Outline

- ◆ Pre-crisis, crisis and post-crisis trends (2004-2010)
- ◆ Macro-prudential measures
  - Prevention of high credit growth risk
  - Capital requirements
  - Liquidity ratios
  - Regulation on FX lending
- ◆ Conclusions
  - Measures' impact
  - The role of the National Bank
  - Future challenges



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# PRE-CRISIS, CRISIS AND POST-CRISIS TRENDS









# Impact of the Crisis

- ◆ Decline of the deposit growth
- ◆ Significantly lower credit growth ratios
- ◆ Lower profitability ratios
- ◆ Deterioration of the credit quality

	2007	2009	2010
NPLs/Total loans	10.3%	9.1%	9.3%

However,

- ◆ Stable liquidity and solvent position
- ◆ No need for a direct financial support by the Government



# Reasons for the “low” direct impact

- ◆ Low correlation with the global financial market
- ◆ Lack of complex and toxic financial products
- ◆ Conservative approach to credit risk (“credit risk averse”)
- ◆ Macro-prudential measures of the National Bank





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# MACRO-PRUDENTIAL MEASURES OF THE NATIONAL BANK



# Macro-prudential measures

- ◆ Prevention of high credit growth risk - 2008
- ◆ Capital requirements - 2008
- ◆ Liquidity ratios - 2009
- ◆ Regulation on FX lending - 2006

## Structure:

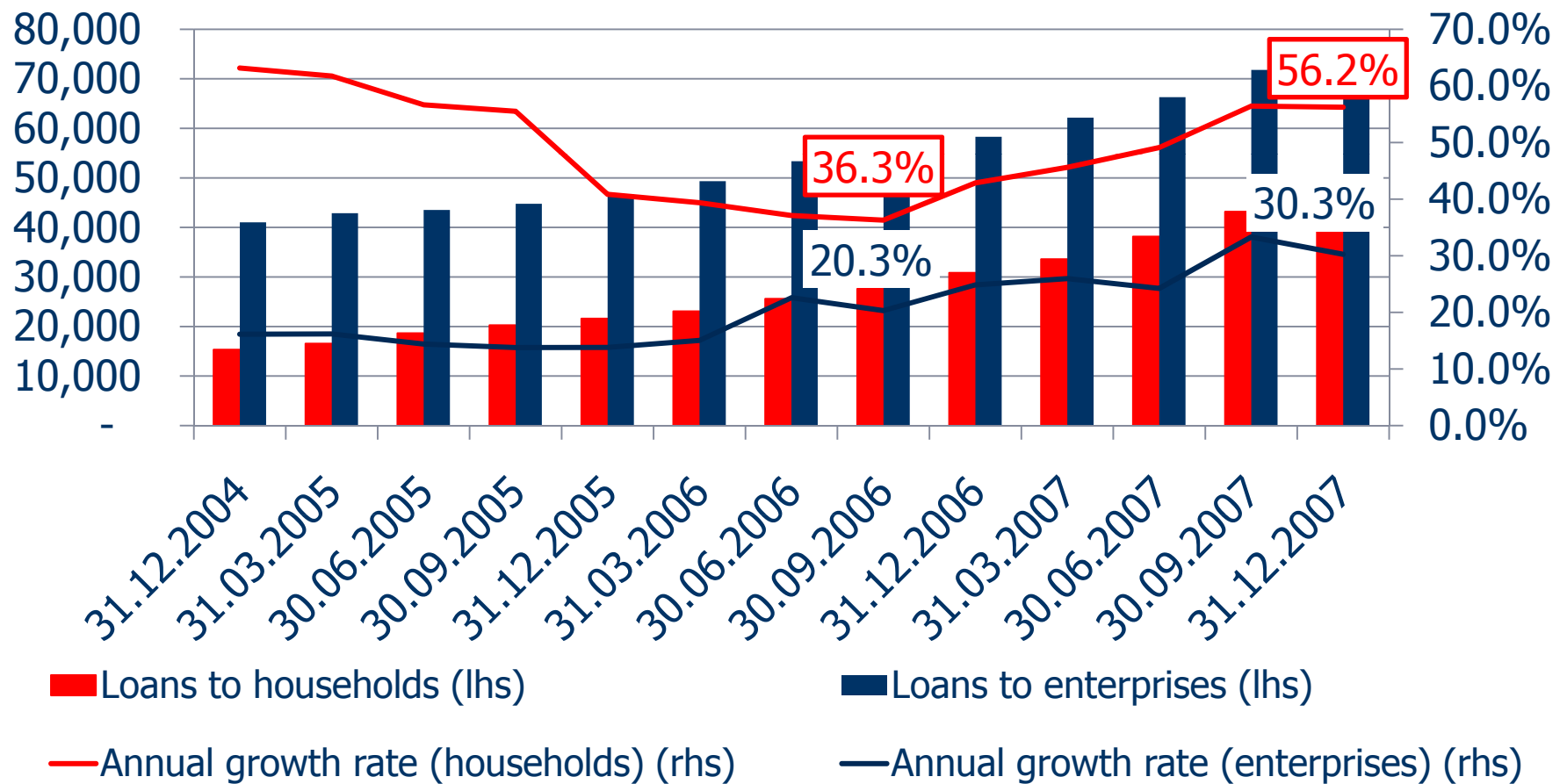
- ◆ Reasons for the introduction of the measure
- ◆ Description of the measure
- ◆ Impact of the measure



# Prevention of high credit growth risk

Average growth rate  
(enterprises) – 20.8%

Average growth rate  
(households) – 49.3%





# Prevention of high credit growth risk

Decision on the compulsory deposit with the NBRM– June, 2008 and December, 2008

- ◆ Cumulative monthly credit growth ratios on short-term and long-term loans to households (2008 and 2009)
- ◆ Higher credit growth than the prescribed monthly ratios - compulsory deposit with the NBRM (1% p.a.)



# Prevention of high credit growth risk

**31.05.2008 - Base**

Month	Growth rate
July 2008	5.6%
August 2008	8.0%
September 2008	10.3%
October 2008	12.5%
November 2008	15.1%
December 2008	18.1%

**31.12.2008 – Base**

Month	Growth rate
January 2009	0.5%
February 2009	1.2%
March 2009	2.1%
April 2009	3.0%
May 2009	4.2%
June 2009	5.4%
July 2009	6.6%
August 2009	7.5%
September 2009	8.3%
October 2009	9.3%
November 2009	10.2%
December 2009	11.3%

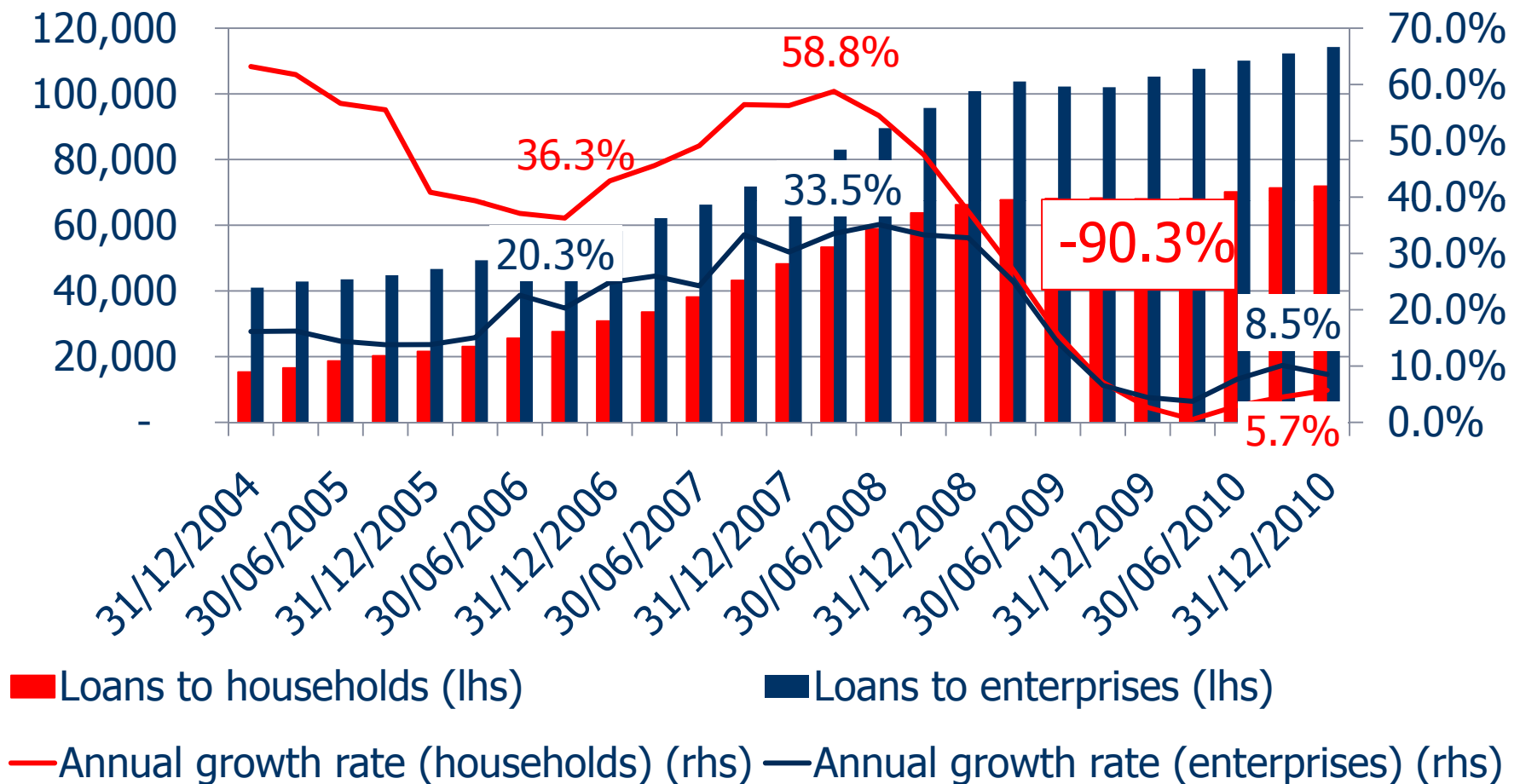


# Prevention of high credit growth risk

- ◆ Only 1 bank within the prescribed monthly rates (during the whole period)
- ◆ Average number of banks above the prescribed monthly rates (per month) - 7
- ◆ Annual growth rate for 2008 – 37.4%
- ◆ Growth rate until October 2009 – 1.83%
- ◆ 2010 – end of the measure

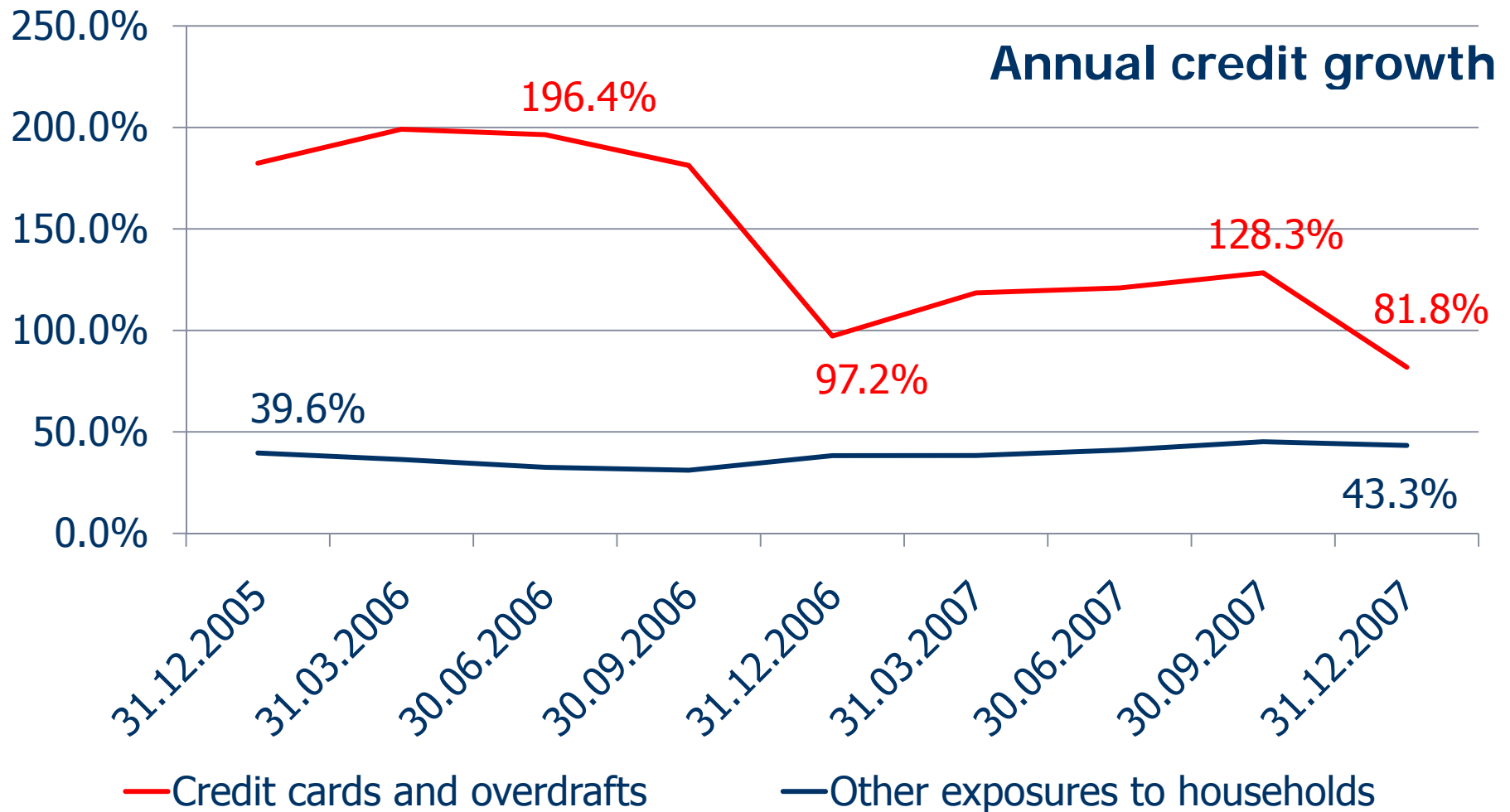


# Prevention of high credit growth risk





# Capital requirements







# Capital requirements

	2006	2007
Total number of issued credit cards	419,168	716,611
Total value of transactions (mil. denars)	2,442.3	7,693.6
% of unsecured claims (credit cards and overdrafts)	N/A	74.5%
% of C, D and E claims (credit cards and overdrafts)	3.8%	4.1%

- ◆ 1/2 of the growth of the total loans to households
- ◆ 40% of the annual growth of C, D and E exposures to households
- ◆ Maturing of the portfolio



# Capital requirements

## Amendments of the Capital Adequacy Methodology – March, 2008

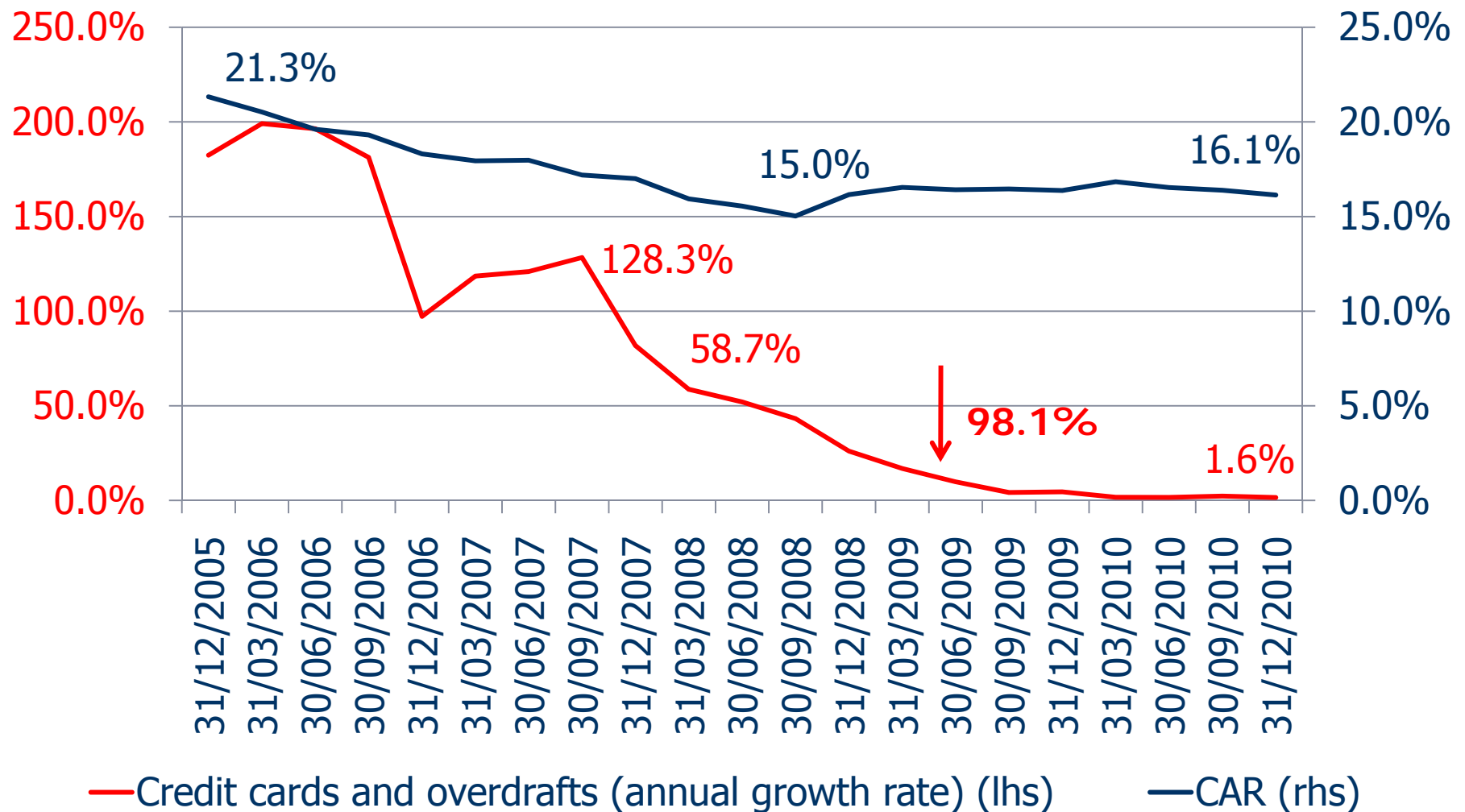
Raising of risk weights on credit cards and overdrafts to 125%

Why capital risk weights?

- ◆ Requires additional capital
- ◆ Reduces the credit growth risk to an acceptable level
- ◆ System-wide measure - impact on all banks

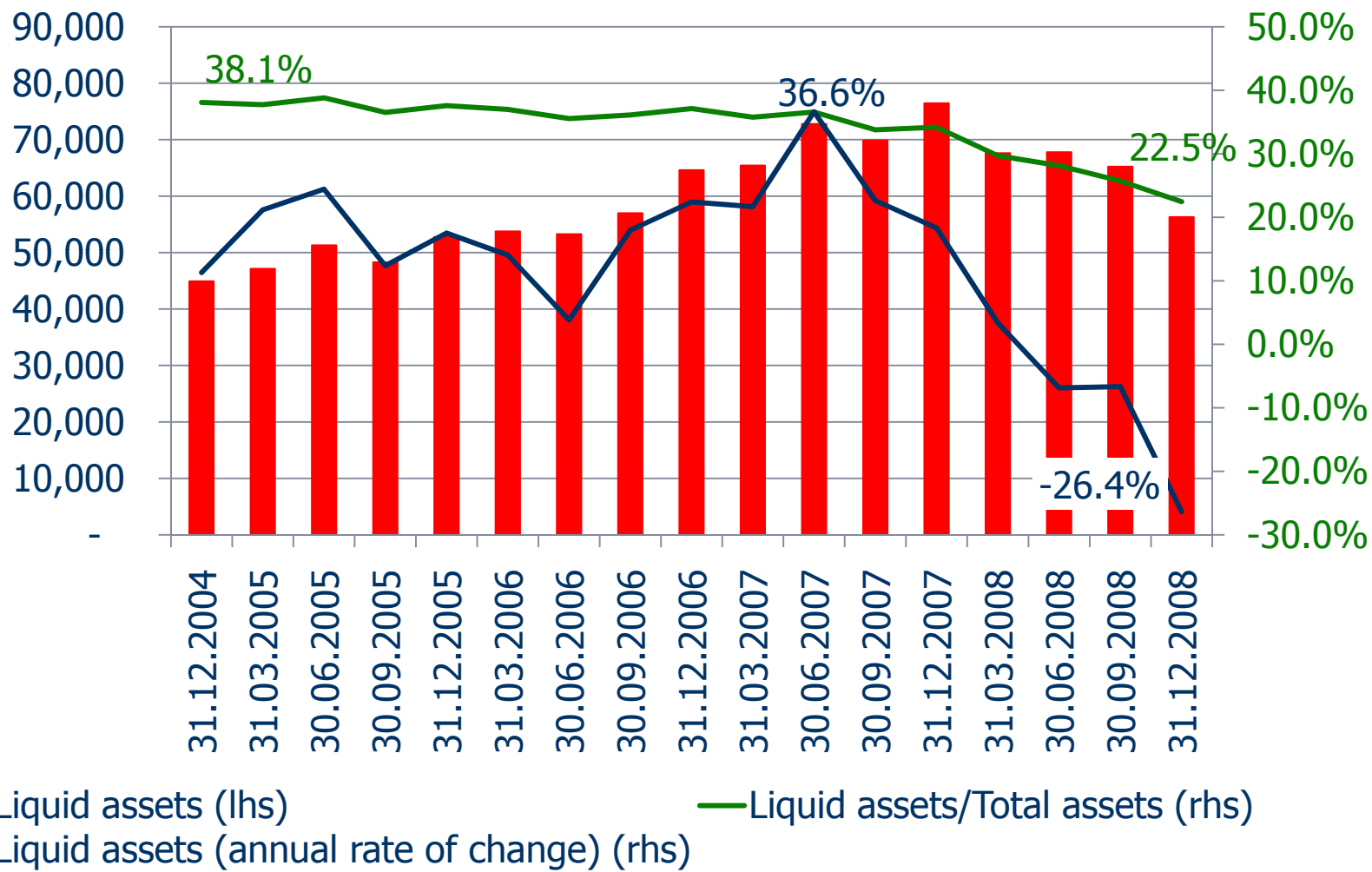


# Capital requirements





# Liquidity ratios





# Liquidity ratios

## Decision on liquidity risk management - December, 2008

- ◆ Minimum liquidity ratios – LR30 and LR180
  - Assets/Liabilities maturing in the following 30, i.e. 180 days = 1
  - Separate ratios for the Denar and FX assets and liabilities
  - Monthly dynamic
    - 28.02.2011 - liquidity ratios (30 days)
    - 28.02.2014 - liquidity ratios (180 days)
- ◆ Requirements for liquidity risk management
  - Enhanced role of the Senior management
  - Explicit requirement for stress-testing
  - Level of concentration
  - Estimation of the expected maturity of assets and liabilities
  - Internal liquidity ratios



# Liquidity ratios

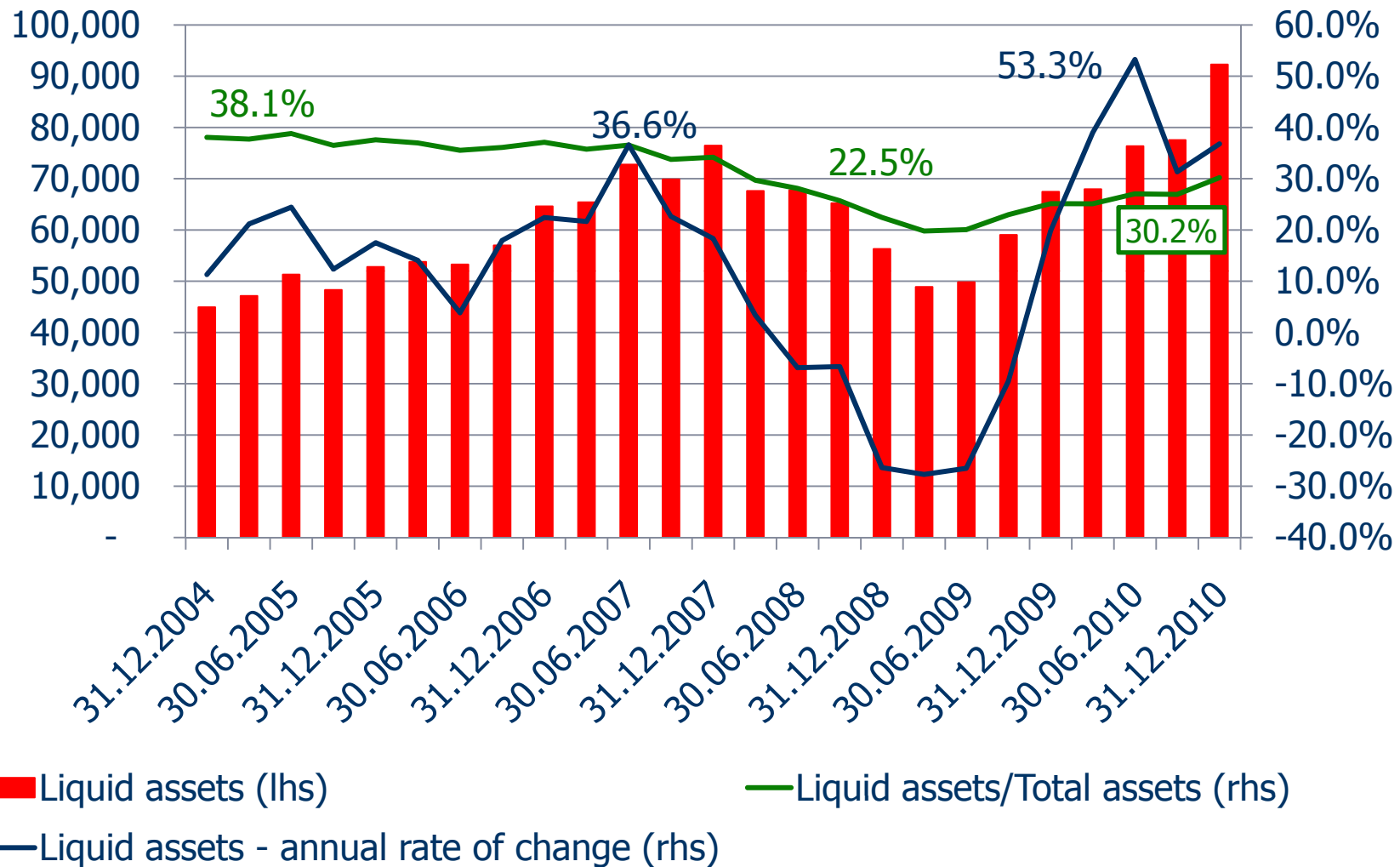
## Decision on liquidity risk management - December, 2008

### Compliance with the Decision (end of 2010)

- ◆ All banks have achieved the minimum denar and FX liquidity ratios up to 30 days
- ◆ Only 2 banks have FX liquidity ratios up to 180 days lower than the prescribed dynamic

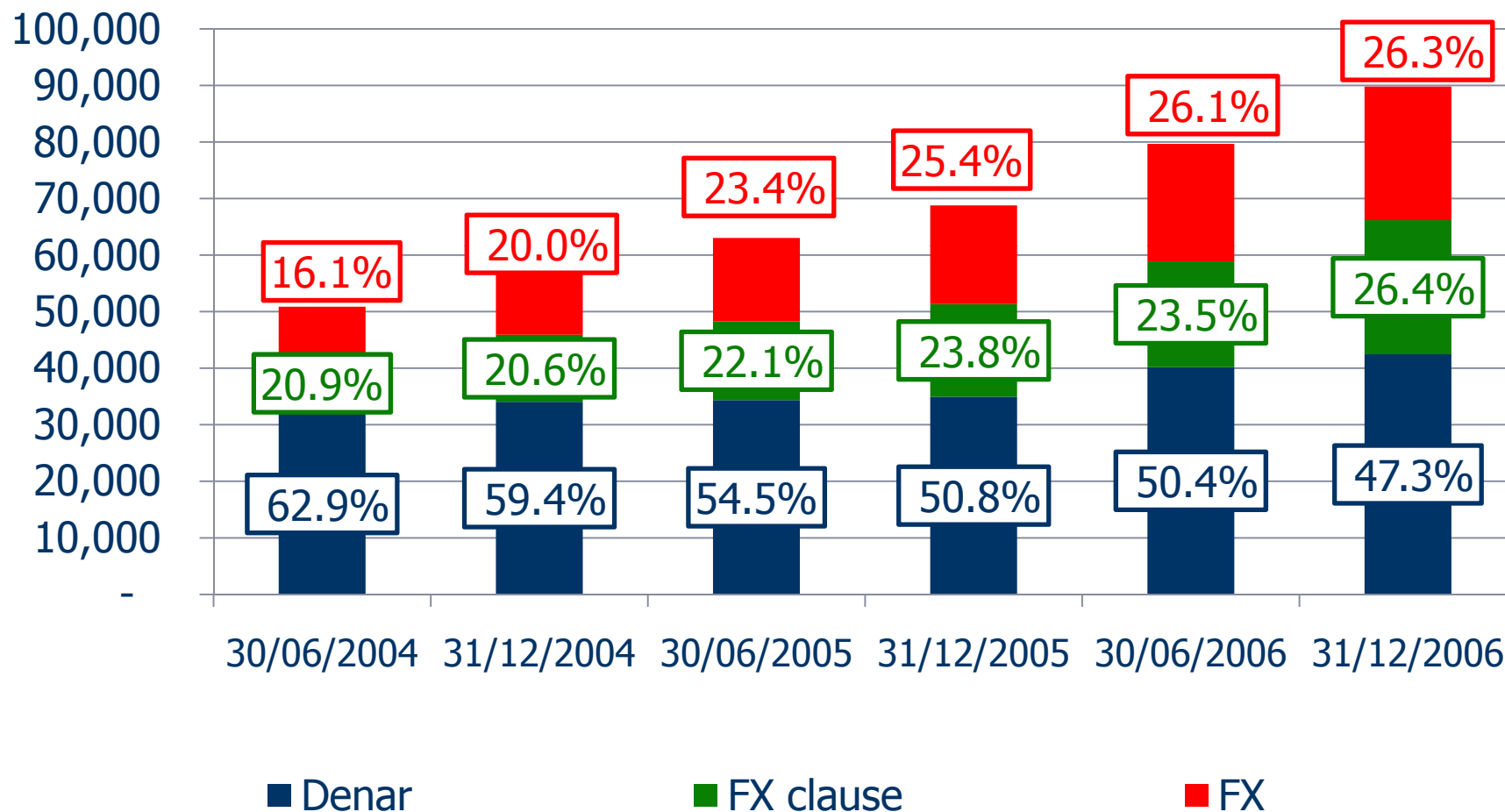


# Liquidity ratios





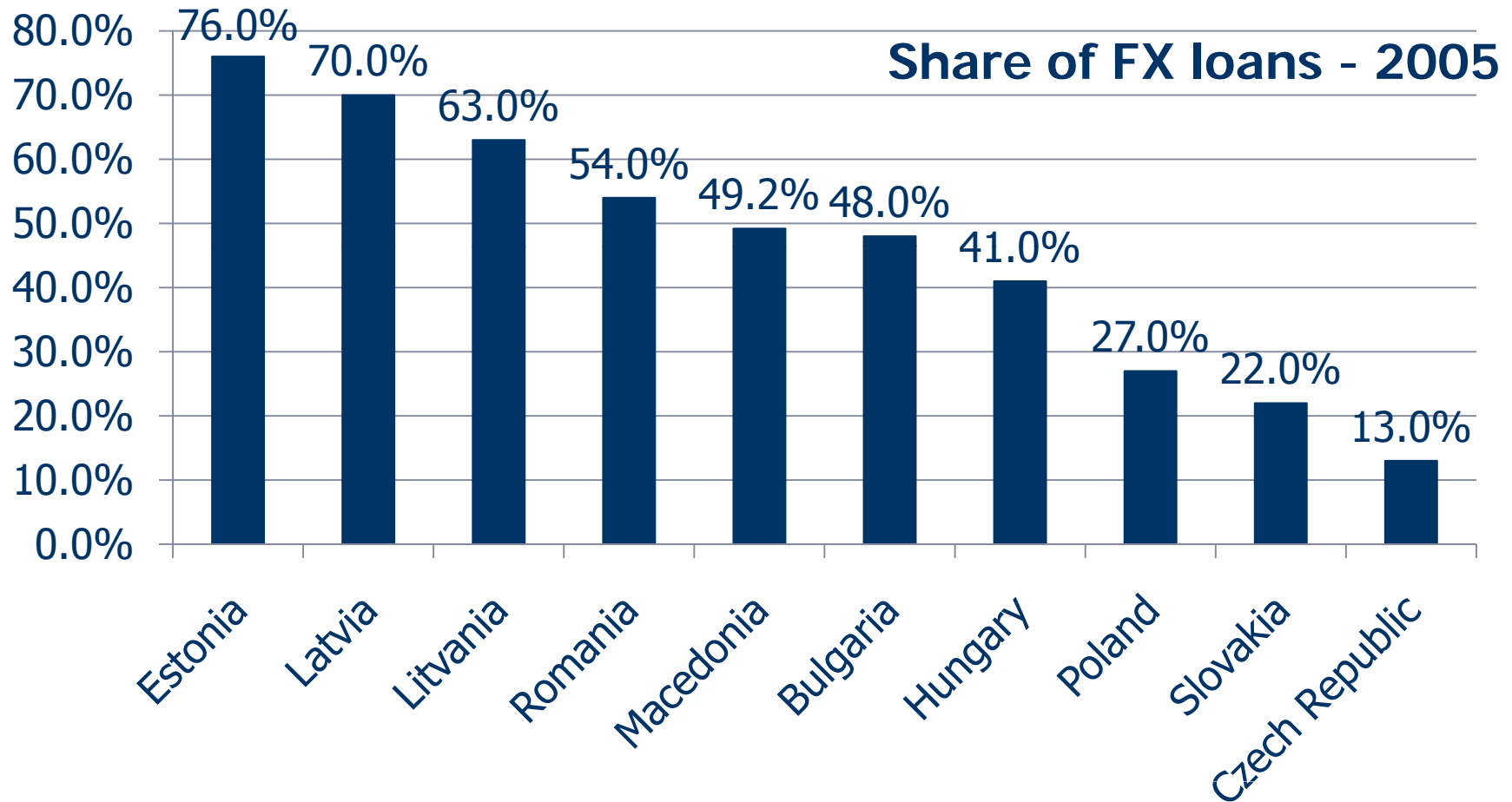
# Regulation on FX lending







# Regulation on FX lending





# Regulation on FX lending

## Decision on the conditions and the manner of extending FX loans and Denar loans with FX clause - March 2006

- ◆ Extending FX loans and Denar loans with FX clause
  - Clients classified as A or B clients by the bank and by the banking system (data from the NBRM's Credit registry), or
  - First-rate collateral (cash or cash equivalents, guaranties by the RM, NBRM, EU countries, first-rated banks, etc.)
- ◆ Written policy and procedures for management of the induced credit risk
  - Criteria for assessment of the (mis)match of clients' FX assets and liabilities
  - Limits on the FX exposure
  - Stress-testing of the FX risk (at least annually)

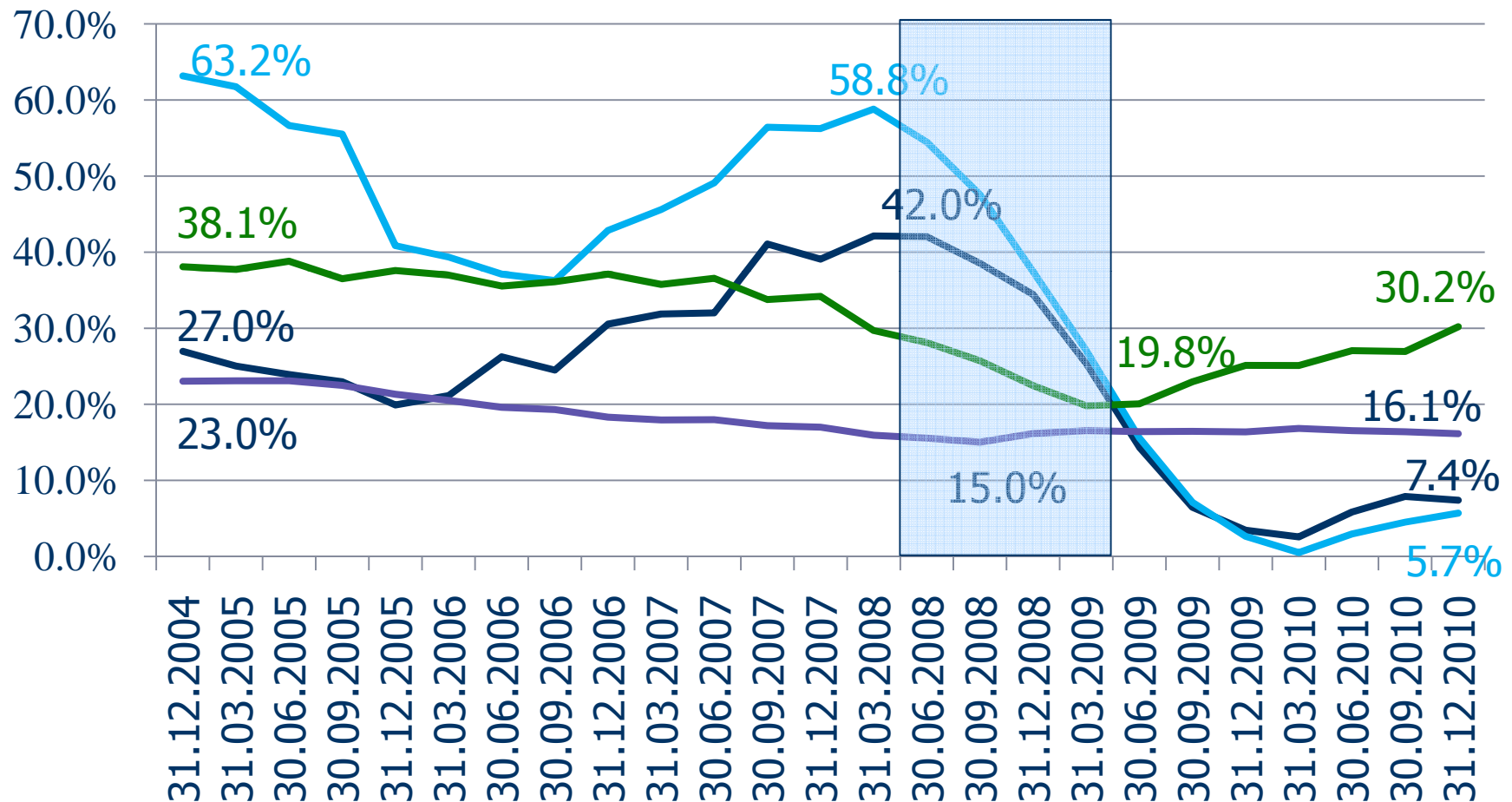


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# CONCLUSIONS



# Measures' impact



— Credit growth rate

— Liquid assets/Total assets

— Credit growth (households)

— Capital adequacy ratio



# The role of the NBRM

- ◆ Responsible for the monetary policy
- ◆ Sole banking supervisor
  - Micro-prudential supervision
  - Macro-prudential supervision
- ◆ Assessment and monitoring of the financial stability



# Future challenges

## When to end the macro-prudential measures?

### Capital requirements

- ◆ NPLs/Total loans = 9.3%
- ◆ NPLs (households)/Total loans (households) = 8.1%
- ◆ C, D, E (credit cards and overdrafts)/Total (credit cards and overdrafts) = 5.8%

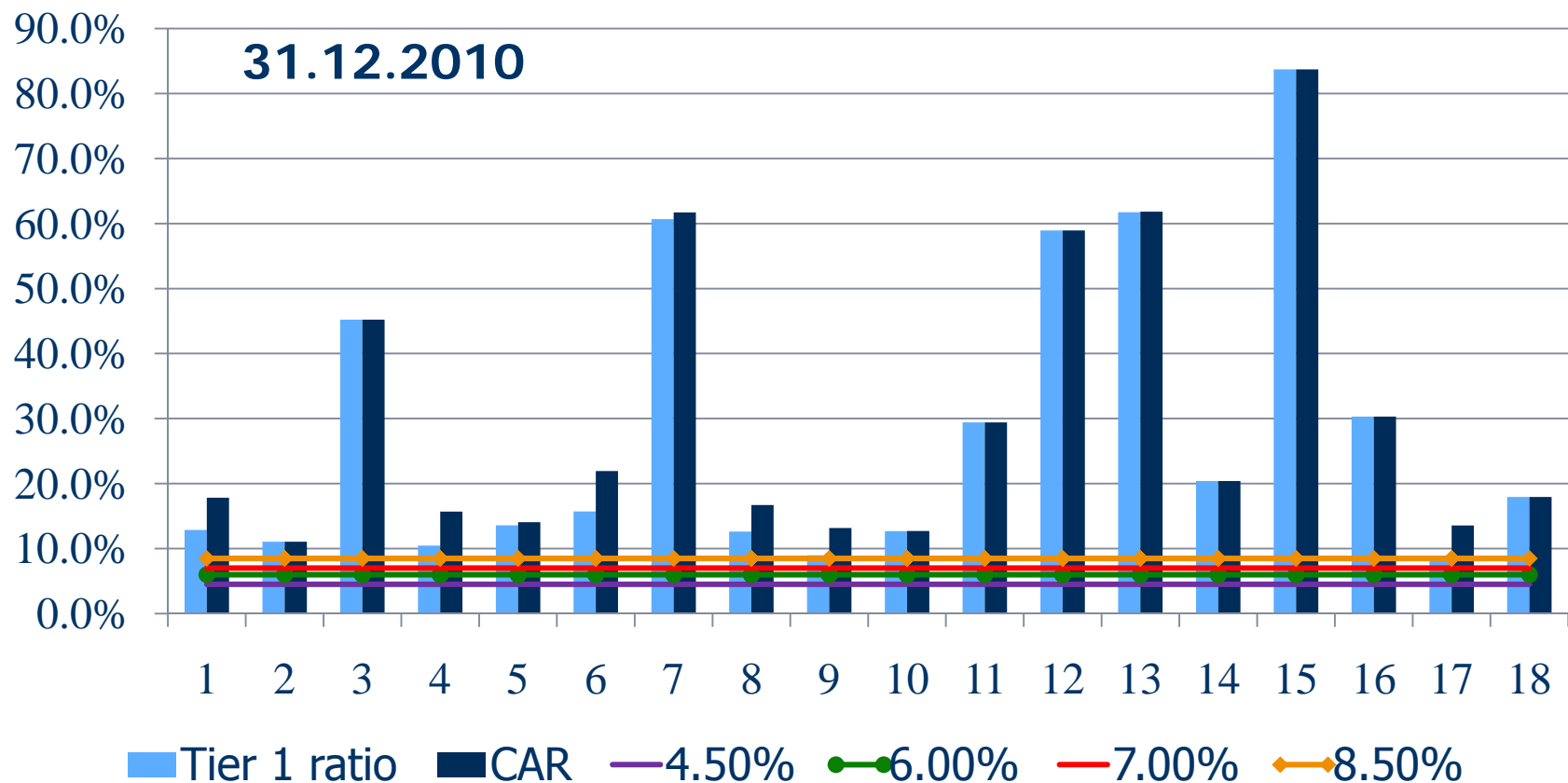
### Liquidity ratios

- ◆ The banking system is still fragile
- ◆ Basel III liquidity ratios
  - Liquidity coverage ratio  $\approx$  LR30
  - Net stable funding ratio – longer time horizon than LR180



# Future challenges

## Basel III implementation





# THANK YOU!

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