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Working Paper Series

No 3/ October 2015

DO REGULATIONS AND SUPERVISION SHAPE THE CAPITAL CRUNCH EFFECT OF LARGE BANKS IN THE EU?

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***JEL Classification:* E32, G21, G28, G32**

***Keywords:* capital ratio, lending, capital crunch, regulations, supervision, procyclicality**

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Publisher: University of Warsaw, Faculty of Management Press

Address:

Str.: Szturmowa 1/3; 02-678 Warsaw, Poland

Telephone: +48 22 55 34 164

Fax: +48 22 55 34 001

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ISSN 2300-4371 (ONLINE)

Do regulations and supervision shape the capital crunch effect of large banks in the EU?

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Abstract

This paper extends the literature on the capital crunch effect by examining the role of public policy for the link between lending and capital in a sample of large banks operating in the European Union. Applying Blundell and Bond (1998) two-step robust GMM estimator we show that restrictions on bank activities and more stringent capital standards weaken the capital crunch effect, consistent with reduced risk taking and boosted bank charter values. Official supervision also reduces the impact of capital ratio on lending in downturns. Private oversight seems to be related to thin capital buffers in expansions, and therefore the capital crunch effect is enhanced in countries with increased market discipline. We thus provide evidence that neither regulations nor supervision at the microprudential level is neutral from a financial stability perspective. Weak regulations and supervision seem to increase the pro-cyclical effect of capital on bank lending.

JEL Classification: E32, G21, G28, G32

Keywords: capital ratio, lending, capital crunch, regulations, supervision, procyclicality

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1. Introduction

The relationship between lending and capital ratios in economic downturns of large banks varies substantially among European Union (EU) member states, meaning that the capital crunch effect (i.e. reduction in lending resulting from capital requirements, as defined by Peek and Rosengren, 1995, p. 625) is diversified. This diversity exists despite the fact that many of these banks compete with each other in the same or similar markets and thus are subject to more or less the same economic factors. They are also subject to the same Basel minimum capital requirements implemented in directives – which intend to create level playing field in the EU single market. Why does the effect of capital on loan growth vary across different EU countries? This paper attempts to answer this puzzle. The primary hypothesis examined in this paper is that country-specific regulatory factors and supervision help to explain cross-country differences in the link between lending and capital ratios amongst large banks in the EU.

This paper extends the existing research by including the regulatory and supervisory characteristics that may affect the amount of capital private banks maintain (Brewer, Kaufmann and Wall, 2008) and capital buffers of banks (Fonseca and González, 2010). Previous studies have been limited to individual countries (United States by Beatty and Liao, 2011 and Carlson et al., 2013; France by Labonne and Lame, 2014; United Kingdom by Mora and Logan, 2011), so that all banks were affected equally by the country's regulations and supervisory policy towards banks. Those studies which focused on the link between lending and capital across countries, have not accounted for regulations and supervision (Gambacorta and Marqués-Ibáñez, 2011). In other words, this paper explores the effects, if any, of government policy factors on the association between loan growth and capital ratio in economic downturns.

Whether and how the government policy affects the link between lending and capital is of importance today. The results may have implications for the design of government policies towards bank regulations and bank supervision, both official and private. The different effects of capital ratio on lending may provide information about the extent to which more restrictive regulations

result in the possibility of reduced risk taking and therefore limit the impact of capital on loan growth as well as the extent to which prudential supervision is substituting for market discipline. Therefore our study should shed some light on the potential effects of current modifications in capital standards included in Basel III, and in the EU CRD IV and CRR provisions.

The EU countries in the second half of the nineties and in the first decade of 2000's are a very good sample for investigating the question of the factors explaining this diversity of relationship between capital and lending. On the one hand, in this period the process of harmonization of standards aiming at smoothing functioning of a single market in Europe was gaining momentum. On the other hand, several significant differences between those countries were still present. The differences were particularly visible in the area of bank regulations and supervision (Barth et al., 2006, p. 166-167). As Bart et al. find, both old member states as well as new EU countries (i.e. those which accessed the EU in 2004) differed with respect to the restrictiveness of the regulations and supervision.

The rest of the paper is organized as follows. Section 2 puts our study in the context of research on the role of bank capital for loan supply and thus develops our hypotheses. We describe our sample and research design in Section 3. We discuss results and supplemental analyses in Section 4. Section 5 concludes our work.

2. Theoretical and empirical background

Banking activity is a very strongly regulated business due its inherent financial vulnerability and instability (Minsky, 1986), which results from the market failures inherent to banking activity (i.e. asymmetric information and limited commitment). Banks play an important role in reducing information asymmetry between depositors (households) and borrowers (firms) by providing monitoring of borrowers (Diamond, 1984). This delegated monitoring potentially explains why banks hold lending portfolios instead of focusing on their comparative advantage, i.e. loan origination and monitoring of borrowers (Beatty and Liao, 2014, p. 343). As Diamond (1984) and

Boyd and Prescott (1986) argue, by holding loans banks will have incentives to monitor borrowers and produce information about credit risk, which should reduce the scope for financial instability.

Delegated monitoring increases agency problems between depositors and bank managers because banks fail to take optimal risk from depositors' perspectives. Tirole (2006) shows that either demandable deposits or equity can be used as alternative mechanisms to control these agency problems. However, the need for government bailouts during the recent financial crisis highlighted concerns that insured demand deposits do not provide proper mechanism for monitoring banks or adequate risk taking incentives. This led to calls for banks to be obliged to hold more equity capital. Capital regulation in the form of internationally coordinated standards (Basel I, II and III accords) has been introduced to counteract banks' risk-shifting incentives being exacerbated by provision of government safety net. In particular, Dewatripont and Tirole (1994) put forth the representation hypothesis which argues that government is a representative monitor which helps to protect small dispersed depositors from moral hazard and adverse selection due to the inability of such depositors to conduct the monitoring functions at low cost and due to the potential of free rider problem (see also Tirole, 2001).

Capital market imperfections can restrict bank lending during downturns (the so called capital crunch hypothesis, Peek and Rosengren, 1995). Van den Heuvel (2011) argues that banks may reduce lending due to capital requirements and costs of raising of new equity. The reduction in lending can occur even when the capital requirement is not currently binding because low-capital banks may optimally forgo profitable credit extension now to reduce the risk of future capital inadequacy (see also Borio and Zhu, 2012). This can occur whenever increasing the capital base is more costly than alternative funding sources. There are several explanations for this: information frictions in pecking order theory (asymmetric information, Myers, 1984); issuance of new equity may signal poor performance (adverse selection, Myers and Majluf, 1984); external equity finance may be regarded as more prone to misuse by managers unless it provides sufficient control (agency problems, Jensen and Meckling, 1984).

The problem of the effect of capital ratio on bank lending has been studied extensively since the 1990's, when the first Basel Accord was introduced as an international capital standard. Early studies of the association show that bank capital may exert some impact on lending, but this effect is relatively weak (see Jackson et al., 1999). Several recent papers focus mainly on the relationship between capital and lending, but do not consider the capital crunch effect (see e.g. Berrospide and Edge, 2010; Bridges et al., 2014 Labonne and Lame, 2014). The capital crunch effect is found in large publicly traded banks by Beatty and Liao (2011) and in US commercial banks by Carlson et al. (2013). Additionally, in a cross-country study Gambacorta and Marqués-Ibáñez (2011) show that publicly traded banks tend to restrict their lending more during recessions or crisis periods. This study, however, does not take into consideration the factors explaining the cross-country heterogeneity of the link between lending and capital (i.e. the heterogeneity of capital crunch effect).

Regulations and supervision may influence this link through their impact on market discipline and therefore on capital kept by banks to cover unexpected losses. On the one hand, tighter restrictions on bank activities may reduce depositors' incentives to monitor banks, as they may limit the opportunities for bank managers to undertake risky investments. This may result in lower capital buffers and therefore amplify the capital crunch effect. On the other hand, the opposite may be also true, if such restrictions result in better risk management of credit portfolio due to deeper specialization and greater transparency. Fonseca and González (2010) show that more restrictive constraints on a bank's range of activities are related with greater capital buffers of banks. Carlson et al. (2013) also show that capital crunch hypothesis is not found in banks with greater capital ratios. We therefore expect that more restrictive regulations should be associated with weakened capital crunch effect. Additionally, Brewer et al. (2008) find that more restrictive capital standards are associated with more capital in relation to risky assets. We would accordingly expect tighter restrictions on capital standards to make the capital crunch effect weaker.

Supervisory policies (official supervision, private market oversight, the power of deposit insurer and restrictiveness of deposit insurance scheme) aimed at constraining excessive risk taking

resulting from moral hazard may affect the capital crunch effect in a number of ways. If official supervisory authorities and deposit insurer have greater powers to intervene reasonably (i.e. without political pressure) in banks to discipline managers, they may reduce the risk undertaken by banks and will have a direct positive effect on capital buffers. Effective supervision may also enhance investor confidence regarding expropriation and boost charter values (Fonseca and González, 2010). Empirical evidence finds such valuation effect for large banking organizations (Brewer et al, 2008) and for capital buffers (Fonseca and González, 2010). We thus forecast that stricter official supervision is related with weakened capital crunch effect. Increased market discipline in countries with better private oversight will make the cost of deposits more sensitive to bank risk and therefore result in higher capital buffers (and weakened capital crunch effect). However, if banks decide to operate at lower capital buffers in expansions to adapt to perceptions of reduced short-term risk then capital buffers will be thin (and the capital crunch effect would be strengthened). Reduced moral hazard, related to more market discipline typical for less generous deposit insurance, discourages banks from taking greater risks (Merton, 1977) and to keep higher capital buffers. Empirical evidence confirms this effect, showing that more generous deposit insurance decreases bank capital buffers (Fonseca and González, 2010). For this reason, we expect that regulations reducing moral hazard would have a negative impact on the capital crunch effect.

3. Data and research methodology

3.1. Data

We use pooled cross-section and time series data of individual banks' balance sheet items and profit and loss accounts from 27 EU countries and country-specific macroeconomic indicators for these countries, over a period from 1996 to 2011. The balance sheet and profit and loss account data are taken from the Bankscope database, whereas the macroeconomic data were accessed from the EUROSTAT and the IMF web pages. Due to the fact that capital crunch hypothesis is a better explanation of constrained lending of large banks (see Beatty and Liao, 2011 and Carlson et al., 2013), in each country we identify the 30% of banks with the largest assets. We look at both unconsolidated and consolidated data in a separate analysis to address the problem of potentially

different capital crunch effect in banks consolidating financial statements and thus conducting their business in several financial market segments, e.g. as financial conglomerates. In other words, large banks reporting consolidated statements are larger (“too big to fail” or “too interconnected to fail”, see Schooner and Taylor 2010; Stiglitz 2010, De Haan and Poghosyan 2012) and may be more prone to moral hazard problems, because as the economic theory predicts, such banks undertake too many risky investments (see also Freixas et al. 2007). We exclude from our sample outlier banks by eliminating the extreme bank-specific observations when a given variable adopts extreme values. The resulting sample includes 657 banks (6058 observations) in the case of unconsolidated data and 144 banks (2091 observations) in the case of consolidated financial data.

Barth et al. (2006) assemble a detailed database on bank regulation and supervision in over 150 countries to which we refer in our study. The characteristics of bank regulation in each country will be incorporated through a measure of the scope of activities permitted to banks (REGRESTR) constructed by Barth et al. (2006, and 2013). We measure the regulatory restrictiveness using an index comprising two variables: restrictions on the range of activities (securities, insurance, real-estate activities) and restrictions on bank ownership and control of non-financial firms. In our analysis we chose to use the first principal component of the above-mentioned variables (see Barth et al., 2006). It ranges from -0.3 to 0.5 with higher values indicating wider range of activities permitted to banks.

We also incorporate the capital regulatory index constructed by Barth et al. (2006) as a measure of the stringency of capital requirements. We explore the role of two such indices, with higher values indicating greater stringency. First, the overall capital regulatory index (CAPREG), which is simply the sum of two components: overall capital stringency and initial capital stringency. Its values range from 0 to 10. The other, is the initial capital stringency index (INCAPSTR), which ranges from 0 to 3 and shows whether certain funds may be used to initially capitalize a bank and whether they are officially verified.

As the supervisory effectiveness variable we incorporate two measures developed by Barth et al. (2006, 2013): the official supervisory power (OFFSUP) and the private sector monitoring

(PRIVMON). The OFFSUP, ranging from 0 to 15, measures whether the supervisory authorities have the authority to take specific actions to prevent and correct problems in a bank, and indicates the power of banking supervisors to take prompt corrective action, to restructure and reorganize a troubled bank, and to declare a bank insolvent. PRIVMON captures several private market forces: the intensity of audit requirements, percentage of ten biggest banks rated by international rating agencies as well as by domestic rating agencies, no explicit deposit insurance scheme present and transparency of bank accounting, and ranges between 0 and 11, with higher values suggesting higher powers.

The deposit insurance scheme prevailing in a given country is a very important determinant of banks' moral hazard, and therefore bank risk taking behavior. In our study we adopt the power of the deposit insurer index (DEPINBURANCE) developed by Barth et al. (2006), which captures the ability of this authority to protect the deposit insurance fund. It measures whether the deposit insurer has the authority to make the decision to intervene in a bank, to take legal action against bank directors or officials, and whether it has ever taken any legal action against bank directors or officers. The values for this index range from 0 to 4, with higher values indicating more power.

Due to the fact that deposit insurance schemes are not uniform across countries, we additionally include an index which incorporates various factors mitigating the moral hazard (MORALHAZARD) developed by Barth et al. (2006). This variable ranges from 0 to 3, with higher values indicating stronger risk-mitigating factors, and measures whether banks fund the deposit insurance scheme or risk-based premiums as well as whether there is a formal coinsurance component.

3.2. The econometric model

The empirical models that addressed the question of whether a bank-capital induced credit crunch was hindering the recovery were developed in the early- and mid-1990s in the US. We follow contemporary adaptations of those models available in several studies (Berrospide and Edge, 2010; Beatty and Liao, 2011; Carlson et al., 2013; Labonne and Lame, 2014; Bridges et al., 2014). Our basic model is given in equation (1) and will be applied at each country level to identify the

association between loan growth and capital ratio during downturns (Downturn*CAP). This model reads as follows:

$$\begin{aligned} \Delta Loan_{i,t} = & \alpha_1 \Delta Loan_{i,t-1} + \alpha_2 \Delta Loan_{i,t-2} + \alpha_3 Downturn + \alpha_4 CAP_{i,t} + \alpha_5 Downturn * CAP_{i,t} + \\ & \alpha_6 LIQGAP_{i,t} + \alpha_7 DEP BANKS_{i,t} + \alpha_8 \Delta CAP_{i,t} + \alpha_9 QLP_{i,t} + \alpha_{10} size_{i,t} + \alpha_{11} \Delta UNEMPL_{j,t} + \\ & \alpha_{12} \sum_{j=1}^{27} Country_j + \alpha_{13} \sum_{t=1996}^{2011} T_t + \vartheta_{i,t} + \varepsilon_t \end{aligned} \quad (1)$$

where: i - the number of the bank; j-the number of country; t- the number of observation for the i-th bank; $\Delta Loan$ – annual real loan growth rate; CAP – capital ratio, i.e. equity capital divided by total assets; LIQGAP –liquidity gap, calculated as (loans to nonfinancial sector subtract deposits of nonfinancial sector subtract interbank deposits)/loans to nonfinancial sector; this variable measures the extent to which bank loans are financed by unstable funding (i.e. securitizations, etc.); DEP BANKS – deposits from banks divided by total assets; ΔCAP – annual change in capital ratio; QLP – is quality of lending portfolio (it equals loan loss provisions divided by average loans); size – logarithm of assets; $\Delta UNEMPL$ - annual change in unemployment rate. Elements $\sum_{j=1}^{27} Country_j$ and $\sum_{t=1996}^{2011} T_t$ are a set of country and time dummy variables. ϑ are unobservable bank-specific effects that are not constant over time but vary across banks. Finally, ε is a white-noise error term.

Considering the fact that we have access to annual data, we relate the loan growth rate to the current period bank specific variables instead of their lagged values. Such choice is motivated by three reasons. First, when banks design their capital allocation plans they do it based on the amount of current risks (expressed in the previous level of capital ratio) and any expected increases in the risks (which result from the loan extension plans) (see Resti and Sironi, 2007, p. 712). Second, the actual lending decisions made throughout the year may also be adjusted taking account of the current changes in bank capital as well as the changes in the quality of credit portfolio (because loan loss charge-offs affect capital through changes in bank profits). This effect would be omitted if the

capital ratio was incorporated as lagged. Third, the usage of lagged variables would not resolve the problem of simultaneity and the endogeneity bias (see also Roberts and Whited, 2011, p. 32).

We predict a negative coefficient on Downturn if loan supply declines during Downturns for reasons other than capital and liquidity constraints (as do Beatty and Liao, 2011, p. 7). Further, if external financing is not frictionless, and banks are concerned that they might violate capital requirements, then the coefficient on CAP is expected to be positive. That is banks with higher capital ratio will extend more loans. The coefficient on interaction term between Downturn and CAP is our measure of capital crunch effect. A positive coefficient implies that lending is constrained by capital. A negative coefficient would indicate that capital is not important in lending extension during downturns.

To investigate the impact of government policy on the capital crunch effect we interact regulatory and supervisory indices with our measure of capital crunch, i.e. Downturn*CAP. The large number of country variables and the need to use interaction terms indicate that it is best to incorporate each of the coefficients separately rather than incorporating the interaction terms of all country variables at once (see e.g Barth et al., 2006 and Fonseca and González, 2010). The model used to test the role of regulations (denoted as REGULATION) is given below:

$$\begin{aligned} \Delta Loan_{i,t} = & \alpha_1 \Delta Loan_{i,t-1} + \alpha_2 \Delta Loan_{i,t-2} + \alpha_3 Downturn + \alpha_4 CAP_{i,t} + \alpha_5 Downturn * CAP_{i,t} + \\ & \alpha_6 LIQGAP_{i,t} + \alpha_7 DEP BANKS_{i,t} + \alpha_8 \Delta CAP_{i,t} + \alpha_9 QLP_{i,t} + \alpha_{10} size_{i,t} + \alpha_{11} \Delta UNEMPL_{j,t} + \\ & \alpha_{13} REGULATION_j + \alpha_{14} REGULATION_j * Downturn * CAP_{i,t} + \alpha_{15} \sum_{j=1}^{27} Country_j + \\ & \alpha_{16} \sum_{t=1996}^{2011} T_t + \vartheta_{i,t} + \varepsilon_t \end{aligned} \quad (2)$$

The model used to test the role of supervision (denoted as SUPERVISION) reads as:

$$\begin{aligned} \Delta Loan_{i,t} = & \alpha_1 \Delta Loan_{i,t-1} + \alpha_2 \Delta Loan_{i,t-2} + \alpha_3 Downturn + \alpha_4 CAP_{i,t} + \alpha_5 Downturn * CAP_{i,t} + \\ & \alpha_6 LIQGAP_{i,t} + \alpha_7 DEP BANKS_{i,t} + \alpha_8 \Delta CAP_{i,t} + \alpha_9 QLP_{i,t} + \alpha_{10} size + \alpha_{11} \Delta UNEMPL_{j,t} + \\ & \alpha_{13} SUPERVISION_j + \alpha_{14} SUPERVISION_j * Downturn * CAP_{i,t} + \alpha_{15} \sum_{j=1}^{27} Country_j + \\ & \alpha_{16} \sum_{t=1996}^{2011} T_t + \vartheta_{i,t} + \varepsilon_t \end{aligned} \quad (3)$$

In equation (2) (equation (3)) a positive coefficient on interaction term between REGULATIONS (SUPERVISION) and Downturn*CAP would indicate that the positive relation between loan growth and capital ratio in downturns increases with the country variable, consistent with the diminished market discipline, which may lead to enhanced capital crunch effect. A negative coefficient implies diminished risk taking and indicates that the country variable mitigates the capital crunch effect.

In our study we apply the system of generalised method of moments (GMM) proposed by Blundell and Bond (1998) with Windmeijer correction (2005). We control for the potential endogeneity of CAP, LIQGAP, DEPBANKS, Δ CAP and QLP in the two-step system GMM estimation procedure by the inclusion of up to four lags of explanatory variables as instruments. The UNEMPL, as well as the country and the time dummy variables are the only variables considered exogenous. As the consistency of the GMM estimator depends on the validity of the instruments, we consider two specification tests. The first is the test verifying the hypothesis of absence of second-order serial correlation in the first difference residuals (AR(2)) and the absence of first-order serial correlation in the differentiated residuals (AR(1)). The second test which we apply is the Hansen's J statistic for over-identifying restrictions, which tests the overall validity of the instruments tests (see Roodman, 2009, p. 141).

Our models include dynamic interaction between the capital ratio and the variables describing changes in economic activity. As there is no comparable dataset including information on business cycle stages in the EU member states, we had to assess the business cycle fluctuations for the whole set of countries. To do this, we estimated frequencies and amplitudes of the Almost Periodically Correlated (APC) stochastic process describing deviations from the long term trend of the GDP growth observed quarterly using dataset covering in almost all EU countries (but for Croatia, Cyprus, Czech Republic, Iceland, Ireland, Malta, Romania and Spain) 72 observations in the period of 1st quarter of 1995 up to the 4th quarter of 2012 (other applications of this approach show Parzen and Pagano, 1971; Frances and Dijk, 2005). The cyclical component, estimated according to a subsampling scheme, described in details by Lenart and Pipień (2013), was utilized

to assess whether in a particular year the economy has contracted or not. We defined Downturn period in the case when at least two quarters in a year can be characterized by a slowdown or recession. This means that in those quarters deviation from the long term growth trend may be positive or negative but the changes as compared to the previous quarter should be negative. In an opposite case we marked appropriate year as no Downturn period.

4. Empirical results

Table 1 reports descriptive statistics of the sample (panel A) and the correlation coefficients from the pooled estimation (panel B). Consistent with prior research (e.g. Berrospide and Egde, 2010; Beatty and Liao, 2011; Carlson et al., 2013; Labonne and Lame, 2014) we find positive and significant coefficient of 0.074 (p-value below 0.01) on CAP, indicating that on average loan growth of banks in the EU is positively related to capital ratio. The negative correlation coefficient between CAP and size suggests that banks with higher assets have lower capital ratios. Therefore, following Carlson et al. (2013) we expect that large banks will be more sensitive to capital ratio in their lending activity.

In table 2 we show the values of indices measuring the restrictiveness of regulations and supervision across EU countries. As can be seen, there is a huge diversity of these measures in the EU member states.

Table 1.
Summary descriptive statistics of key regression variables (in percentage points) (PANEL A) and correlations (PANEL B).

| PANEL A | | | | | | | | | | |
|-----------------|----------------|-----------|------------|--------------|-----------------|------------|-----------|--------------|------------|-------|
| | Δ LOANS | Downturn | CAP | Downturn*CAP | Δ UNEMPL | LIQGAP | DEPBANKS | Δ CAP | QLP | size |
| UNCONSOLIDATED | | | | | | | | | | |
| Mean | 4.03 | 0.51 | 6.75 | 3.71 | -0.15 | -84.40 | 13.93 | 0.05 | 0.80 | 15.11 |
| # observations | 9773 | 11876 | 10452 | 10451 | 10955 | 10328 | 8042 | 9602 | 10145 | 10575 |
| CONSOLIDATED | | | | | | | | | | |
| Mean | 3.82 | 0.51 | 5.83 | 3.04 | -0.02 | -49.82 | 17.96 | 0.03 | 0.43 | 7.79 |
| # observations | 1998 | 2304 | 2089 | 2089 | 2282 | 2091 | 2088 | 1943 | 2016 | 2091 |
| PANEL B | | | | | | | | | | |
| UNCONSOLIDATED | | | | | | | | | | |
| Δ LOANS | 1 | | | | | | | | | |
| Downturn | 0.019 * | 1 | | | | | | | | |
| CAP | 0.086 *** | 0.022 ** | 1 | | | | | | | |
| Downturn*CAP | 0.063 *** | 0.751 *** | 0.517 *** | 1 | | | | | | |
| Δ UNEMPL | 0.034 *** | 0.261 *** | -0.034 *** | 0.169 *** | 1 | | | | | |
| LIQGAP | -0.131 *** | 0.001 | 0.092 *** | 0.051 *** | 0.003 | 1 | | | | |
| DEPBANKS | -0.058 *** | -0.024 ** | -0.423 *** | -0.222 *** | 0.020 * | 0.014 | 1 | | | |
| Δ CAP | -0.101 *** | 0.002 | 0.081 *** | 0.032 *** | 0.041 *** | 0.036 *** | 0.038 *** | 1 | | |
| QLP | 0.011 | 0.032 *** | -0.059 *** | 0.006 | 0.142 *** | -0.033 *** | 0.008 | -0.068 *** | 1 | |
| size | 0.025 ** | -0.005 | -0.276 *** | -0.140 *** | 0.063 *** | -0.080 *** | 0.238 *** | 0.018 * | -0.085 *** | 1 |
| CONSOLIDATED | | | | | | | | | | |
| Δ LOANS | 1 | | | | | | | | | |
| Downturn | -0.012 | 1 | | | | | | | | |
| CAP | -0.011 | -0.030 | 1 | | | | | | | |

| | | | | | | | | | | | | | |
|--------------|-----------|-----------|------------|------------|-----------|------------|--------|--------|------------|---|--|--|--|
| Downturn*CAP | -0.004 | 0.824 *** | 0.382 *** | 1 | | | | | | | | | |
| ΔUNEMPL | -0.038 * | 0.159 *** | -0.014 | 0.122 *** | 1 | | | | | | | | |
| LIQGAP | -0.052 ** | -0.020 | 0.123 *** | 0.039 * | 0.026 | 1 | | | | | | | |
| DEPBANKS | -0.003 | -0.019 | -0.130 *** | -0.073 *** | 0.033 | -0.074 *** | 1 | | | | | | |
| ΔCAP | -0.008 | 0.020 | 0.184 *** | 0.128 *** | 0.096 *** | -0.018 | -0.021 | 1 | | | | | |
| QLP | 0.074 *** | 0.044 * | 0.164 *** | 0.107 *** | 0.315 *** | 0.061 *** | 0.032 | -0.005 | 1 | | | | |
| size | -0.018 | 0.011 | -0.506 *** | -0.207 *** | 0.080 *** | 0.048 ** | -0.027 | -0.001 | -0.171 *** | 1 | | | |

Δloan – annual loan growth rate; CAP - capital ratio, i.e. equity capital to total assets; ΔCAP – annual change in capital ratio; DEPBANKS - Deposits from banks to total assets; LIQGAP - Loans less Total customer deposits less Deposits from banks divided by Loans; size - logarithm of total assets; QLP - Loan loss provisions divided by average loans ; ΔUNEMPL – change in annual unemployment rate; #obs – number of observations; *, **, *** denote significance at the 10%, 5% and 1% level, respectively.

Table 2.**Heterogeneity of indices measuring regulatory restrictiveness and stringency of supervision and of the link between lending and capital of large banks during downturns**

| Country | REGRESTR | CAPREG | INCAPSTR | OFFSUP | PRIVMON | DEPINSURANCE | MORALHAZARD | Link between lending and capital | | | Link between lending and capital | | |
|-----------------|----------|--------|----------|--------|---------|--------------|-------------|----------------------------------|----------------|------|----------------------------------|----------------|-----|
| | | | | | | | | # banks | # observations | | # banks | # observations | |
| | | | | | | | | UNCONSOLIDATED | | | CONSOLIDATED | | |
| Austria | -0.94 | 5 | 2 | 10 | 8 | 2 | 2 | -0.518 | 24 | 211 | -0.712 | 6 | 61 |
| Belgium | -0.94 | 6 | 0 | 13 | 9 | | | -2.253 | 6 | 39 | 0.219 | 7 | 68 |
| Bulgaria | 1.05 | 5 | 1 | 10 | 6 | 1 | 1 | 0.373 | 4 | 43 | | | |
| Cyprus | 1.49 | 3 | 2 | 11 | 7 | 2 | 2 | | 1 | 5 | 0.701 | 3 | 37 |
| Czech Republic | 1.92 | 6 | 3 | 12 | 10 | 4 | | | 2 | 19 | -0.240 | 3 | 39 |
| Denmark | -0.06 | 4 | 2 | 14 | 9 | 0 | 1 | -0.159 *** | 20 | 165 | 3.557 | 7 | 82 |
| Estonia | -0.50 | 8 | 2 | 8 | 7 | 1 | 2 | | 1 | 7 | | 2 | 23 |
| Finland | -0.06 | 8 | 3 | 11 | 7 | 0 | 1 | | 1 | 6 | | 2 | 16 |
| France | -0.06 | 4 | 2 | 6 | 7 | 4 | 2 | -1.727 * | 27 | 200 | -0.030 | 21 | 213 |
| Germany | -0.94 | 6 | 3 | 11 | 7 | 1 | 2 | -0.850 ** | 350 | 3524 | -1.945 | 6 | 72 |
| Greece | -0.50 | 3 | 2 | 11 | 11 | | | | 2 | 22 | -0.297 | 5 | 64 |
| Hungary | 0.82 | 5 | 2 | 15 | 9 | 0 | 2 | | | | | 3 | 39 |
| Ireland | -0.94 | 5 | 2 | 10 | 7 | 2 | 1 | | | | | 4 | 46 |
| Italy | 1.92 | 8 | 3 | 12 | | 0 | 1 | 0.048 | 145 | 1278 | -1.984 | 14 | 143 |
| Latvia | -0.50 | 4 | 3 | 10 | 7 | 1 | 2 | -2.071 | 4 | 30 | | 2 | 19 |
| Lithuania | 0.82 | 4 | 1 | 10 | 10 | 1 | 1 | | 2 | 11 | | 2 | 18 |
| Luxembourg | -0.06 | 9 | | 15 | | 1 | | -1.708 ** | 7 | 41 | | 3 | 36 |
| Malta | -0.72 | 5 | 3 | 14 | 9 | | | | | | | | |
| Netherlands | -2.04 | 3 | 2 | 11 | 10 | 0 | 0 | | | | 0.959 | 7 | 76 |
| Poland | -1.16 | 5 | 2 | 13 | | 0 | 2 | 0.195 | 8 | 61 | -0.491 | 3 | 25 |
| Portugal | 1.92 | 4 | 0 | 9 | 8 | | 2 | | 2 | 15 | -0.581 | 6 | 70 |
| Romania | 1.49 | 8 | 3 | 9 | 8 | 3 | 2 | | 2 | 19 | -0.014 | 2 | 20 |
| Slovak Republic | 1.05 | 7 | 2 | 8 | 9 | 0 | 2 | | 2 | 14 | | 2 | 24 |
| Slovenia | 0.38 | 7 | 2 | 13 | 4 | | | | 3 | 26 | | 3 | 36 |
| Spain | -0.94 | 4 | 1 | 10 | 9 | 1 | 1 | -1.815 | 20 | 172 | 0.304 * | 10 | 128 |
| Sweden | 0.38 | 4 | 1 | 11 | 8 | 1 | 2 | -0.164 | 18 | 140 | | 4 | 37 |
| United Kingdom | -2.92 | 10 | 3 | 15 | 9 | 2 | 3 | -8.336 * | 6 | 20 | -0.537 | 17 | 196 |

Notes: The coefficients measuring the link between lending and capital in downturns have been estimated using the GMM estimator with robust standard errors, applied to model given by equation (1). *, **, *** denote significance at the 10%, 5% and 1% level, respectively; # denotes the number of banks or observations.

4.1. Effects of bank regulation on the link between loan growth and capital ratio

The regression results given by equation 2 are shown in columns (1)-(3) of Table 3 for unconsolidated data and in columns (4)-(6) for consolidated data. Coefficients of both CAP and Downturn*CAP are positive and statistically significant (but for the REGRESTR regression model in which they are marginally significant). The results in columns (1) and (4) are consistent with an expectation that restrictions on bank activities have two opposite effects on capital ratios and thus on the link between lending and capital. The negative (and statistically significant) coefficient in the unconsolidated data suggests that tighter restrictions on bank activities limit the capital crunch effect. The positive coefficient present in consolidated data implies that reduced market discipline increases the economic importance of capital in downturns.

Moreover, more restrictive overall capital standards (CAPREG) and initial capital requirements (INCAPSTR) diminish the effect of capital ratio on loan growth in Downturns, as the coefficients on both Downturn*CAP*CAPREG and Downturn*CAP*INCAPSTR are negative in both unconsolidated and consolidated data. Thus our results are consistent with increased capital ratios in countries with more restrictive capital standards. This results in a weakened capital crunch effect.

Table 3
Regulations and capital crunch

| Variables: | (1) | (2) | (3) | (4) | (5) | (6) |
|-------------------|-----------------------|-----------------------|----------------------|---------------------|--------------------|-------------------|
| | <i>UNCONSOLIDATED</i> | | | <i>CONSOLIDATED</i> | | |
| Δ loan(-1) | -0.079 ** (-1.98) | -0.075 * (-1.87) | -0.065 (-1.62) | 0.002 (0.05) | 0.006 (0.14) | 0.018 (0.37) |
| Δ loan(-2) | -0.115 (-1.51) | -0.106 (-1.41) | -0.047 (-0.72) | 0.086 ** (2.33) | 0.085 ** (2.35) | 0.079 * (1.85) |
| Downturn | -2.864 ** (-2.34) | -1.593 * (-1.67) | -0.739 (-1.02) | -2.149 (-0.47) | -6.354 (-1.10) | -5.573 (-0.96) |
| CAP | 0.249 (1.46) | 0.493 *** (2.65) | 0.520 ** (2.43) | -0.683 (-0.73) | -1.297 (-1.14) | -1.106 (-1.09) |
| Downturn*CAP | 0.306 (1.56) | 0.681 ** (2.02) | 0.882 ** (2.14) | 0.368 (0.45) | 3.393 (1.28) | 2.114 (1.16) |
| LIQGAP | -0.008 (-1.29) | -0.007 (-1.12) | -0.007 (-1.15) | 0.002 (0.28) | 0.005 (0.53) | 0.003 (0.42) |
| DEPBANKS | 0.049 (0.5) | -0.008 (-0.09) | -0.030 (-0.40) | -0.096 (-1.01) | -0.091 (-0.93) | -0.108 (-1.13) |
| Δ CAP | -1.291 * (-1.291) | -1.443 ** (-1.443) | -1.436 * (-1.436) | 0.354 (0.354) | 0.401 (0.401) | 0.466 (0.466) |

| | | | | | | |
|------------------------|------------|------------|------------|----------|-----------|----------|
| | (-1.90) | (-1.98) | (-1.88) | (0.60) | (0.67) | (0.75) |
| QLP | -0.353 | -0.389 | -0.504 | 3.437 | 3.493 | 3.406 |
| | (-0.69) | (-0.77) | (-1.12) | (0.79) | (0.80) | (0.79) |
| size | 0.795 *** | 0.918 *** | 1.060 *** | -2.634 | -1.885 | -1.288 |
| | (3.49) | (3.68) | (3.11) | (-0.72) | (-0.64) | (-0.55) |
| Δ UNEMPL | 2.091 *** | 2.084 *** | 2.001 *** | -1.253 * | -1.445 ** | -1.264 * |
| | (5.14) | (5.44) | (5.35) | (-1.81) | (-2.11) | (-1.67) |
| Intercept | -9.534 * | -15.675 ** | -18.420 ** | 27.560 | 16.743 | 14.188 |
| | (-1.94) | (-2.49) | (-2.24) | (0.83) | (0.69) | (0.70) |
| REGRESTR | 1.363 *** | | | -2.395 | | |
| | (2.93) | | | (-1.38) | | |
| Downturn*CAP* REGRESTR | -0.136 *** | | | 0.424 | | |
| | (-2.72) | | | (1.14) | | |
| CAPREG | | 0.526 ** | | | 1.598 | |
| | | (1.96) | | | (1.50) | |
| Downturn*CAP* CAPREG | | -0.091 ** | | | -0.401 | |
| | | (-2.35) | | | (-1.23) | |
| INCAPSTR | | | 1.423 ** | | | 2.997 |
| | | | (2.25) | | | (1.37) |
| Downturn*CAP* INCAPSTR | | | -0.341 ** | | | -0.560 |
| | | | (-2.48) | | | (-0.97) |
| AR(1) | -1.64 | -1.64 | -1.6 | -1.85 * | -1.87 * | -1.79 * |
| AR(2) | -0.82 | -0.85 | -1.48 | -1.56 | -1.67 | -1.35 |
| Hansen test | 602.23 *** | 605.44 *** | 598.16 *** | 135.78 | 134.6 | 132.1 |
| #banks | 657 | 657 | 650 | 144 | 144 | 141 |
| # observations | 6068 | 6068 | 6027 | 1588 | 1588 | 1552 |

Notes: The models are given by equation (2). The symbols have the following meaning: Δ loan – annual loan growth rate; Downturn - Dummy equal to one in Downturns and 0 otherwise; CAP - capital ratio, i.e. equity capital to total assets; Downturn*CAP - Interaction between Downturn and capital ratio (CAP) Δ CAP – annual change in capital ratio; DEP BANKS - Deposits from banks to total assets; LIQGAP - Loans less Total customer deposits less Deposits from banks divided by Loans; size - logarithm of total assets; QLP - Loan loss provisions divided by average loans ; Δ UNEMPL – change in annual unemployment rate. REGRESTR is the measure of regulatory restrictions on bank activities. CAPREG is the measure of overall stringency of capital requirements. INCAPSTR is the initial capital stringency index. Coefficients for the country and time dummies are not reported. The models have been estimated using the GMM estimator with robust standard errors. T-statistics are given in brackets. Data range 1996-2011. *, **, *** denote significance at the 10%, 5% and 1% level, respectively. # denotes the number of banks or observations.

4.2. Effects of supervision on the link between loan growth and capital ratio

In Table 4 in Columns (1) and (5) we find that the coefficient on interaction between OFFSUP and Downturn*CAP is negative (but only marginally significant in unconsolidated data) which supports the hypothesis that effective official supervision reduces excessive risk taking and boosts bank charter values and thus weakens capital crunch effect. The positive Downturn*CAP* PRIVMON

coefficient in columns (2) and (6) is consistent with thin capital buffers related to short-term risk perceptions in countries with increased market discipline. Thus we find support for increased capital crunch effect in countries with more effective private oversight.

Results in columns (3) and (7) confirm the offsetting effects of the deposit insurer on the link between lending and capital. The positive and significant coefficient in the case of unconsolidated data (column (3)) supports the view that decreased market discipline in countries with more restrictive deposit insurer reduces the capital buffers (and thus the capital crunch effect is enhanced). In contrast the negative, although not statistically significant coefficient of $\text{Downturn} \cdot \text{CAP} \cdot \text{DEPINSURANCE}$, is consistent with decreased risk taking and the benefits of holding more capital in countries with greater powers of deposit insurer.

The negative and statistically significant coefficient $\text{Downturn} \cdot \text{CAP} \cdot \text{MORALHAZARD}$ in column (8) confirms that the reduced moral hazard, related to more market discipline typical of less generous deposit insurance, encourages large banks operating as financial conglomerates to undertake low-risk investments and to keep higher capital buffers. We thus find that regulations reducing moral hazard have a negative impact on the capital crunch effect. Such result, however, is not supported in the case of unconsolidated data (column (4)) as the coefficient of $\text{Downturn} \cdot \text{CAP} \cdot \text{MORALHAZARD}$ is positive, supporting the view that increased market discipline may result in short-term risk management producing thin capital buffers in expansions. This implies strengthened the capital crunch effect.

Table 5. Supervision and capital crunch.

| Variables: | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
|-------------------------|-----------------------|-----------------------|----------------------|----------------------|----------------------|---------------------|----------------------|---------------------|
| | <i>UNCONSOLIDATED</i> | | | | <i>CONSOLIDATED</i> | | | |
| $\Delta\text{loan}(-1)$ | -0.079 ** (-2.00) | -0.093 *** (-3.28) | -0.073 * (-1.74) | -0.070 * (-1.79) | 0.003 (0.08) | -0.021 (-0.36) | -0.011 (-0.23) | -0.017 (-0.38) |
| $\Delta\text{loan}(-2)$ | -0.107 (-1.39) | -0.145 ** (-2.13) | -0.123 (-1.55) | -0.060 (-0.85) | 0.095 ** (2.36) | 0.077 (1.47) | 0.093 ** (2.08) | 0.076 * (1.88) |
| Downturn | -2.534 * (-1.74) | -1.356 (-0.88) | -3.286 * (-1.87) | -2.631 ** (-1.99) | -3.774 (-0.83) | -3.450 (-0.70) | -4.329 (-0.70) | -5.282 (-0.97) |
| CAP | 0.536 *** (2.80) | 0.385 ** (2.16) | 0.447 *** (2.88) | 0.485 *** (2.84) | -0.938 (-0.92) | -0.691 (-0.65) | -1.012 (-0.99) | -1.225 (-1.18) |
| Downturn*CAP | 1.966 (1.47) | -1.391 (-1.15) | 0.077 (0.57) | -0.470 (-1.55) | 1.232 (0.43) | -6.216 * (-1.93) | 0.805 (1.13) | 3.481 ** (1.97) |
| LIQGAP | -0.007 (-1.18) | -0.010 (-1.18) | -0.006 (-1.03) | -0.007 (-1.07) | 0.001 (0.15) | 0.000 (0.06) | 0.002 (0.27) | 0.005 (0.61) |
| DEPBANKS | 0.000 (0.00) | -0.042 (-0.63) | 0.010 (0.12) | 0.001 (0.02) | -0.107 (-0.93) | -0.118 (-1.01) | -0.144 (-1.07) | -0.140 (-1.22) |
| ΔCAP | -1.473 ** (-1.97) | -0.305 (-0.44) | -1.433 * (-1.92) | -1.406 * (-1.80) | 0.460 (0.78) | 0.505 (0.72) | 0.612 (0.78) | 0.624 (0.74) |
| QLP | -0.319 (-0.64) | -0.638 ** (-2.10) | -0.333 (-0.63) | -0.365 (-0.72) | 3.648 (0.81) | 3.890 (0.84) | 4.206 (0.86) | 4.114 (0.77) |
| size | 0.815 *** (3.56) | 1.063 *** (3.18) | 0.962 *** (2.76) | 0.861 *** (3.05) | -1.108 (-0.38) | -0.556 (-0.16) | -1.158 (-0.41) | -2.058 (-0.65) |
| ΔUNEMPL | 2.132 *** (5.42) | 2.701 *** (4.09) | 2.015 *** (5.28) | 1.998 *** (5.06) | -1.484 ** (-2.01) | -1.059 (-1.55) | -1.838 ** (-2.04) | -1.439 * (-1.78) |
| Intercept | -15.676 ** (-2.28) | -4.655 (-0.92) | -11.686 * (-1.82) | -9.401 ** (-2.00) | 15.282 (0.63) | 39.433 (1.05) | 18.610 (0.61) | 15.664 (0.56) |
| OFFSUP | 0.392 | | | | 0.213 | | | |

| | | | | | | | | | |
|-------------------------------|------------|-----------|------------|-----------|---------|----------|---------|----------|--|
| | (1.24) | | | | (0.36) | | | | |
| Downturn*CAP* OFFSUP | -0.153 | | | | -0.051 | | | | |
| | (-1.52) | | | | (-0.22) | | | | |
| PRIVMON | | -1.221 * | | | | -3.315 * | | | |
| | | (-1.78) | | | | (-1.67) | | | |
| Downturn*CAP* PRIVMON | | 0.201 | | | | 0.823 * | | | |
| | | (1.40) | | | | (1.80) | | | |
| DEPSINSURANCE | | | -1.540 ** | | | | 0.490 | | |
| | | | (-2.05) | | | | (0.40) | | |
| Downturn*CAP* DEPINSURANCE | | | 0.395 * | | | | -0.114 | | |
| | | | (1.93) | | | | (-0.33) | | |
| MORALHAZARD | | | | -1.656 | | | | 7.280 ** | |
| | | | | (-0.90) | | | | (2.36) | |
| Downturn*CAP* MORALHAZARD | | | | 0.524 | | | | -1.647 * | |
| | | | | (1.51) | | | | (-1.85) | |
| AR(1) | -1.63 | -1.61 | -1.64 | -1.59 | -1.81 * | -1.85 * | -1.79 * | -1.9 * | |
| AR(2) | -0.89 | -0.88 | -0.86 | -1.41 | -1.82 * | -1.78 * | -1.78 * | -1.22 | |
| Hansen test | 603.28 *** | 468.2 *** | 592.38 *** | 590.9 *** | 134.28 | 118.8 | 111.3 | 112.5 | |
| # banks | 657 | 497 | 644 | 637 | 144 | 124 | 123 | 123 | |
| #observations | 6068 | 4688 | 5966 | 5921 | 1588 | 1384 | 1350 | 1345 | |

Notes: The models are given by equation (3). The symbols have the following meaning: Δ loan – annual loan growth rate; Downturn - Dummy equal to one in Downturns and 0 otherwise; CAP - capital ratio, i.e. equity capital to total assets; Downturn*CAP - Interaction between Downturn and capital ratio (CAP); Δ CAP – annual change in capital ratio; DEP BANKS - Deposits from banks to total assets; LIQGAP - Loans less Total customer deposits less Deposits from banks divided by Loans; size - logarithm of total assets; QLP - Loan loss provisions divided by average loans; Δ UNEMPL – change in annual unemployment rate. OFFSUP is the measure of official supervisory power. PRIVMON is measured by private monitoring index. DEPINSURANCE is the index measuring the power of the deposit insurer. MORALHAZARD is the index which measures various factors mitigating moral hazard. Coefficients for the country and time dummies are not reported. The models have been estimated using the GMM estimator with robust standard errors. T-statistics are given in brackets. Data range 1996-2011. *, **, *** denote significance at the 10%, 5% and 1% level, respectively. # denotes the number of banks or observations.

5. Conclusions

This paper attempts to explain the substantial differences across EU countries in the link between lending and capital of large banks in downturns by public policy characteristics unique to the country in which these banks are headquartered. The results highlight the fact that restrictions on bank activities and more stringent capital standards weaken the capital crunch effect, consistent with reduced risk taking and boosted bank charter values.

Moreover, official supervision also alters the impact of capital ratio on lending in downturns, which is consistent with reduced risk taking incentives in countries with better micro-prudential supervision. Private market oversight seems to be related to short-term risk management producing thin capital buffers in expansions, and therefore the capital crunch effect is enhanced in countries with increased market discipline. Stricter powers of deposit insurer and regulations reducing moral hazard have ambiguous effect on the link between lending and capital, as they are related with increased capital crunch effect in unconsolidated data, and weakened capital crunch effect in consolidated data.

Our analysis has three basic implications for public policy. First, both regulations and supervision at the micro-prudential level are not neutral from a financial stability perspective. Weak regulations and supervision increase the pro-cyclical effect of bank lending, due to insufficient capital kept by banks to cover unexpected losses which rise in downturns.

Second, the results feed into the current policy debate on the new guidelines for capital suggested by the Basel Committee on Banking Supervision (BCBS, 2011), referred to as Basel III, since we find that lending of both groups of large banks (i.e. reporting unconsolidated and consolidated data) is less sensitive to capital ratio if the regulations oblige banks to have more capital relative to risks.

Third, from a supervisory perspective, our results suggest that official supervision has potential in reducing pro-cyclicality of capital. However, due to the fact that in the case of consolidated data (the too big to fail banks or systemically important financial institutions) we find that the countercyclical effect of micro-prudential supervision is not statistically significant, we infer that to supervise such banks effectively, there is a need for coordination between several national authorities. We thus provide empirical support to establishment of multinational supervisory authorities, such as the Single Supervisory Mechanism in the EU.

6. Acknowledgements

We gratefully acknowledge the financial support provided by Polish National Scientific Centre (NCN), No. of decision DEC-2012/05/D/HS4/01356. This paper's findings, interpretations, and conclusions are entirely those of the authors and do not necessarily represent the views of the University of Warsaw or other institutions at which the authors are affiliated. We thank participants in the "Panel Data Modelling Conference. Theory and practice" held at Warsaw School of Economics and in the Scientific seminar held at National Bank of Poland.

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