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FINANSIJSKA STABILNOST: 10 PITANJA I OTPRILIKE SEDAM ODGOVORA

Govor g. Jaime Caruane, generalnog direktora BIS, na Simpozijumu povodom 50-to godišnjice Rezervne banke Australije, Sidnej, 9. februara 2010. godine.

Rezime

Ovaj govor postavlja pitanja, pored ostalog, o stabilnosti tržišta, dovoljnosti kontrole privatnog rizika i zahteva za kapitalom, politike prema sistemskom riziku, njihovom odnosu sa monetarnom politikom i međunarodnom saradnjom. Date su tri poente: prvo, finansijska stabilnost zahteva ne samo da se unapredi bankarska regulativa na mikro nivou već takođe da na makroprudencijalnom nivou budu ugrađene margine sigurnosti u dobrim vremenima i da velike i povezane firme internalizuju svoj doprinos sistemskom riziku. Drugo, finansijska stabilnost zahteva da makroekonomska politika ima ulogu, uključujući monetarnu politiku. Najzad, međunarodna saradnja je od vitalnog značaja za održavanje finansijske stabilnosti.

FINANCIAL STABILITY: 10 QUESTIONS AND ABOUT SEVEN ANSWERS

Jaime Caruana
General manager of the BIS

Speech delivered by Mr Jaime Caruana, General Manager of the BIS, at the 50th Anniversary Symposium of the Reserve Bank of Australia, Sydney, 9 February 2010.

Summary

The speech poses questions about, inter alia, the stability of markets, sufficiency of private risk control and capital requirements, policies towards systemic risk, their relationship to monetary policy and international cooperation. Three points are made. First, financial stability requires not only that bank regulation be improved at the micro level but also that, at the macroprudential level, margins of safety be built up in good times and that large and connected firms internalise their contribution to systemic risk. Second, financial stability requires that macroeconomic policies, including monetary policy, play a role. Finally, international cooperation is vital to maintain financial stability.

Vrlo sam zadovoljan što sam pozvan da govorim na simpozijumu pedesete godišnjice Rezervne banke Australije. Pre nego što otpočnem zadatu temu, dozvolite mi da uputim svoje čestitke RBA. Ovo je centralna banka sa konzistentno jakim glasom na međunarodnim forumima. Banka za međunarodna plaćanja imala je koristi od prisustva Rezervne banke kao akcionara od 1970. godine i neizmerne koristi od doprinosa stalnih gostujućih ekonomista Rezervne banke u Bazelu i Predstavništvu za Aziju i Pacifik. Dozvolite mi da iskoristim ovu priliku da izrazim svoje uvažavanje izuzetne saradnje između naše dve institucije i svoju nadu za još jaču saradnju.

Svoj rad sam koncipirao kao 10 pitanja o finansijskoj stabilnosti. Priznajem na početku da ima odgovora različite izvesnosti i jasnoće na samo otprilike sedam od tih pitanja. Ovaj pristup dugujem Alanu Blinderu, koji je izložio 16 pitanja i 12 odgovora o monetarnoj politici u Bank of Spain 2006. godine. Njegov koeficijent odgovora na pitanja veći je od mog koeficijenta, što bi se i očekivalo od profesora sa Prinstonskog univerziteta koji govori o sređenijem predmetu. Zato se nadam da ćete prihvatiti mojih otprilike sedam odgovora i dati mi 70% kao prelaznu ocenu.

1. Da li su finansijski bumovi i padovi svojstveni tržišnom ekonomskom sistemu?

Nažalost, odgovor je potvrdan. Finansijska tržišta suštinski nisu stabilna. Međutim, dodao bih nijansu u ovom odgovoru. Pre krize, mnogi su mogli zamišljati da samo nova tržišta pate od finansijske nestabilnosti. Posle nordijske bankarske krize, neki su se priklonili nadanju da je finansijska nestabilnost u razvijenim ekonomijama samo prolazni problem povezan sa deregulacijom. Sada smo saznali da se pod određenim okolnostima finansijska tržišta ne stabilizuju sama od sebe ili da se ne stabilizuju sama od sebe po bilo kojoj društveno prihvatljivoj ceni.

Treba da se složimo sa Čarlsom Kindlebergerom, nekadašnjim ekonomistom u BIS, da manije, panike i lomovi nisu neobični. Zaista, ono što se događa jednom u životu izgleda da se javlja svakih pet do 10 godina. Prema jednom popisu, 93 zemlje su imale 117 sistemskih i 51 manji poremećaj svog finansijskog sistema četvrt veka pre poslednje globalne finansijske krize. To je šest godišnje! Pokažite zemlju koja nije bila pogođena!

Odgovor nije u tome da se finansijska tržišta suzbijaju. Umesto toga, treba priznati da su tržištima potrebna pravila, ograničenja i pažljiv monitoring tako da poremećaji tržišta budu ređi i da manje koštaju. I da je tim pravilima, ograničenjima i sprovođenju monitoringa potreban makropudencijalni pristup - to jest, pristup koji nastoji da obuhvati ne samo pojedinačne rizike već i sistemske rizike.

Da li to može da se uradi? Pre krize, često su postavljali pitanje onima koji su izražavali zabrinutost u pogledu neravnoteže i pogrešnih cena rizika: šta to mislite da znate bolje od učesnika na tržištu? Ovo pitanje je značajno jer mnoga zvanična tela sada nastoje da na bolji način monitorišu finansijske rizike tako da se može preduzeti rana akcija za sprečavanje krize ili umanji njena potencijalna cena. MMF i Bord za finansijsku stabilnost angažovani su na takvoj aktivnosti ranog upozorenja i imaju zastrašujući zadatak da uočavaju probleme finansijskih tržišta pre nego što nas zagluše. Mislim da je kriza sugerisala ne to da smo pametniji ili da znamo više od učesnika na tržištu, već da imamo luksuz dužeg vremenskog horizonta, različite podsticaje i ciljeve javne politike.

Ono što se događa jednom u životu izgleda da se javlja svakih pet do 10 godina. Prema jednom popisu, 93 zemlje su imale 117 sistemskih i 51 manji poremećaj svog finansijskog sistema četvrt veka pre poslednje globalne finansijske krize. To je šest godišnje! Pokažite zemlju koja nije bila pogođena!

Međutim, ovo su početni dani tako da moramo da budemo oprezni u pogledu stvaranja suviše visokih očekivanja. Zaista, jedna od lekcija iz krize je da je bilo lakše priznati ranjivosti nego učiniti bilo šta u vezi sa njima. Nikad neće biti lako

I am very pleased to have been invited to speak at the Reserve Bank of Australia's 50th Anniversary Symposium. Before I embark on my assigned topic, permit me to extend my congratulations to the RBA. This is a central bank with a consistently strong voice in international forums. The Bank for International Settlements has benefited from the Reserve Bank's presence as a shareholder since 1970, and has profited immensely from the contribution of a succession of Reserve Bank visiting economists, both in Basel and in the Representative Office for Asia and the Pacific. Let me take this opportunity to express my appreciation of the strong record of collaboration between our two institutions and my hope for an ever stronger relationship.

I have turned my assignment into 10 questions about financial stability. Let me admit at the outset that I have answers, of varying certainty and clarity, for only about seven of them. I owe this format to Alan Blinder, who set out 16 questions and 12 answers on monetary policy at the Bank of Spain in 2006. His ratio of answers to questions was higher than mine, as one would expect of a professor of economics at Princeton University speaking on a more settled subject. So I hope that you will accept my seven or so answers and allow me 70% as a passing grade.

1. Are financial booms and busts inherent in a market-based economic system?

Unfortunately, the answer is yes. Financial markets are not intrinsically stable. However, I would like to add a nuance to this answer. Before this crisis, many might have imagined that only emerging markets suffered from financial instability. After the Nordic banking crises, some clung to the hope that financial instability in advanced economies was just a transitional problem associated with financial deregulation. Now we have learned that financial markets are not self-stabilising under certain conditions, or that they do not self-stabilise at any socially acceptable cost.

We should recognise with Charles Kindleberger, once a BIS economist, that manias, panics and crashes are not unusual. Indeed, a once-in-a-lifetime event seems to happen every five to 10 years. On one count, 93 countries experienced 117 systemic and 51 lesser disruptions of their financial systems in the quarter-century before the latest global financial crisis. That is six a year! Name the country that has not been hit!

The answer is not to repress financial markets. Rather, it is to recognise that markets need rules, constraints and careful monitoring so that market failures are less frequent and less costly. And that the rules, constraints and monitoring exercises need a macroprudential approach - that is, one that tries to capture not only individual risks but system-wide risks.

Can that be done? Before the crisis, people who expressed concern about imbalances and risk mispricing were frequently asked: why do you think you know better than market participants? The question is important because many official bodies are now seeking to monitor financial risks better so that early action can be taken to prevent a crisis or lessen its potential costs. The IMF and the Financial Stability Board are engaged in such an early warning exercise and have the daunting task of spotting financial market problems before they crash around our ears. I think the crisis has suggested, not that we are smarter or know better than market participants, but rather that we have the luxury of longer horizons, different incentives and a public policy objective.

However, these are early days and we should be cautious about raising expectations too high. Indeed, one of the lessons of the crisis is that it was easier to recognise vulnerabilities than to do anything about them. It will never be easy to take unpopular preventive action to avert events that are

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preduzimati nepopularne preventivne akcije da se spreče događaji koji se percepiraju kao malo verovatni i neizvesni u pogledu vremena nastupanja.

2. Može li upravljanje rizicima u privatnom sektoru da drži rizike pod kontrolom?

Samo ne može. Razmotrimo ovo pitanje iz ugla upravljanja rizicima unutar finansijskih firmi i kao širi proces kojim učesnici na tržištu nameću disciplinu jedni drugima u pogledu uzimanja rizika.

Kada je reč o upravljanju rizicima unutar firmi, bilo bi pogrešno negirati vrlo realni progres koji je ostvaren. Konceptualni i kvantitativni pristupi su razvijeni na mnogo sjajnih načina. Međutim, bilo bi još gore negirati da se upravljanje rizicima pokazalo manje pouzdanim od onog što smo se nadali. Zato što su kapacitet i podsticaji za uzimanje rizika jasno preovladali sva poboljšanja u upravljanju rizicima. Upravljanje rizicima je kvantifikovanje retkih, to jest, ocenjivanje repnih rizika, gde je po definiciji iskustvo oskudno. Čak je i stres testiranje bilo zatečeno, ne uspevajući da uzme u obzir one naizgled daleke mogućnosti koje su u stvari došle da nas proganjaju tokom poslednje dve godine. Ukratko, potrebno nam je upravljanje rizicima koje može da se nosi sa poznatim nepoznanicama i nepoznatim nepoznanicama.

Reforma u ovoj oblasti će zahtevati da se potencijalni gubici ocenjuju naspram dužih nizova podataka. Pored toga, ocene treba da uzmu u obzir stresne tržišne uslove, tako da držimo gard čak i posle izlaska nedavnog meteža iz sećanja.

Najvažnije, iznad imputa i modela, videli smo slabosti korporacionog upravljanja i podsticaja unutar firmi. Pošto je upravljanje rizicima očigledno bilo ukrotilo rizike, menadžment je povećavao leveridž u odgovor na podsticaje da "poveća vrednost za akcionare" na osnovu kratkoročnih rezultata. Proširenje puteva može spasiti živote ali ne ako vozači jednostavno povećaju brzinu. Zahtevi za kapitalom su ograničenje brzine u bankarstvu.

Kada je reč o procesima šireg domašaja tržišne discipline, evidencija se ovde može opisati jedino kao razočaravajuća. Da pojedinačne firme nisu uspele da upravljaju svojim rizicima dovoljno je loše; da su im to dozvolili njihovi partneri još je gore. Tržišna disciplina je zatajila ne samo u pogledu firmi, već i u pogledu instrumenata. Na primer, zašto agencije za rejting i krajnji investitori nisu uspeli da insistiraju da originatori hipoteka zadrže interes u hipoteci kako bi se sprečio moralni hazard? Rečeno mi je da je praksa hipotekarnih poverilaca u Australiji bila drugačija.

Postoji konačan razlog zbog koga privatno upravljanje rizicima neće biti dovoljno za kontrolu nad rizicima. Svaka privatna firma uzima osnovni rizik u finansijskom sistemu kao dati rizik. Ali čak i kada svaka pojedinačna firma drži svoje sopstvene rizike pod kontrolom, to ne sprečava akumulaciju sistemskog rizika. Kontrola sistemskog rizika zahteva određeni doprinos regulatora.

3. Da li su zahtevi za kapitalom neophodni i dovoljni za postizanje finansijske stabilnosti?

Da, zahtevi za kapitalom su neophodni, ali, ne, oni nisu dovoljni. Zaista, tvrdim da je regulativa bila samo deo problema i da je samo deo odgovora. Kapital nije dovoljan; regulativa nije dovoljna.

Kao što sam rekao za Bank of England, banka je "dužna da bude bogata". Zahtevi za kapitalom treba da se oslone na duboke džepove koji mogu da apsorbuju gubitke koji nastaju iz finansijskog i ekonomskog stresa, smanjujući na taj način prelivanje rizika iz finansijskog sektora na realnu ekonomiju. Bazelski komitet za superviziju banaka izvukao je lekcije u pogledu potrebe da se unapredi kvalitet kapitala, da se podigne nivo kapitala i da se unapredi obuhvat kapitala okvirom, naročito kada je u pitanju knjiga trgovanja. Postignut je sporazum da su potrebni i opasač i naramenice da bi se pantalone držale jednostavnijim koeficijentom leveridža ako rizikom ponderisani koeficijent bude iskrivljen neadekvatnom ocenom aktive.

Jedno od osnovnih poboljšanja koje je uveo Bazelski komitet u svom reformskom paketu je makroprudencijalni fokus za rešavanje sistemskih rizika i procikličnog jačanja rizika tokom vremena. Naučili smo da ti duboki perceived as low in probability and uncertain of timing.

2. Can private sector risk management keep risks under control?

Not alone. Let us consider this question with reference to both risk management within financial firms and the broader process by which market participants impose discipline on each other's risk-taking.

Regarding risk management within firms, it would be wrong to deny the very real progress that has been made. Conceptual and quantitative approaches have developed in many illuminating ways. However, it would be even more wrong to deny that risk management has proven less reliable than we hoped. Because, the capacity and the incentives to take risks have clearly overwhelmed any improvements in risk management. Risk management is about quantifying the infrequent, that is, assessing tail risks, where by definition experience is sparse. Even stress testing has been caught out, failing to consider those seemingly remote possibilities that have, in fact, come to haunt us over the last two years. In short, we need risk management that can deal with both the known unknowns and those unknown unknowns.

Reform in this area will require that potential losses are assessed in relation to longer runs of data. In addition, assessments will need to take into account stressed market conditions, so that

Jaime Caruana

Jaime Caruana je generalni direktor BIS od 1. aprila 2009. godine.

Pre toga, g. Caruana bio je savetnik glavnog direktora u MMF-u.

Od 2000. do 2006. godine, g. Caruana bio je guverner Bank of Spain, centralne banke Španije i u tom svojstvu, član Upravnog odbora Evropske centralne banke. Bio je takođe predsedavajući Bazelskog komiteta za superviziju banaka od 2003. do 2006. godine i član Foruma za finansijsku stabilnost od 2003. godine. Od 2004. do 2006. godine predsedavao je Grupi za koordinaciju, visokoj grupi donosilaca standarda Bazelskog komiteta, Međunarodne organizacije Komisija za hartije od vrednosti (IOSCO), Međunarodne asocijacije supervizora osiguranja (IAIS) i Zajedničkog foruma. Pre bank of Spain bio je generalni direktor Trezora Španije i skoro 10 godina vodio kompaniju za investicione usluge i kompaniju za upravljanje fondom.

Jaime Caruana

Jaime Caruana became General Manager of the Bank for International Settlements on 1 April 2009.

Previously, Mr Caruana was Financial Counsellor to the Managing Director and Director of the Monetary and Capital Markets Department of the International Monetary Fund.

From 2000 to 2006, Mr Caruana was the Governor of the Bank of Spain, Spain's central bank, and in that capacity, served on the Governing Council of the European Central Bank. He was also the Chairman of the Basel Committee on Banking Supervision from 2003 to 2006 and has been a member of the Financial Stability Forum since 2003. From 2004 to 2006, he chaired the Coordination Group, a senior group of supervisory standard setters from the Basel Committee, the International Organization of Securities Commissions (IOSCO), the International Association of Insurance Supervisors (IAIS), and the Joint Forum. Prior to joining the Bank of Spain, Mr Caruana served as Director General of the Spanish Treasury and headed an investment services company and a fund management company for nearly 10 years.

džepovi koje sam upravo pomenuo moraju da budu još dublji u dobrim vremenima da bi više moglo da se uzme iz njih u lošim vremenima.

Kapital je centralni deo finansijske reforme, ali kriza je ukazala na značaj upravljanja likvidnošću. Dobro kapitalizovana banka će manje verovatno doživeti juriš. A likvidni subjekt ima vremena da mobiliše više akcionarskog kapitala. Ročna transformacija je posao banaka, ali takođe i održavanje adekvatne likvidnosti. Bazelski komitet za superviziju banaka je pristupio rešavanju nedostataka regulatornog okvira za likvidnost koje je pokazala kriza definisanjem amortizera likvidnosti koji su potrebni za unapređenje otpornosti. Banke treba da drže dovoljnu zalihu visoko kvalitetne likvidne aktive da bi mogle da prežive mesec dana dug gubitak pristupa tržištima za finansiranje. Ovaj test je nastavak testa koji je primenjen u Australiji. Banke isto tako moraju da imaju pouzdani model finansiranja koji se uklapa u njen model poslovanja.

Kapital i likvidnost su deo jezgra finansijskih reformi, ali bavljenje sistemskim rizikom je višeslojni zadatak i veći broj mera je na stolu. Moje sledeće pitanje baviće se njima.

4. Šta da se radi sa sistemskim rizikom?

Znamo pravi smer čak i ako nismo razradili pravo odredište.

Mada je bio potreban zvanični odgovor na krizu da bi se izbegao kolaps finansijskog sistema, to je stvaralo nove izazove. Slabe, velike institucije su održavane u životu i merdžeri su neke institucije čak povećali. Dalje, različite mere podrške i spasavanja otvarale su neizmerna pitanja moralnog hazarda ako učesnici na tržištu računaju na njihovo ponavljanje u vremenima poteškoća.

Globalna finansijska kriza je još jednom podvukla da sistemski rizik nije izvan funkcionisanja finansijskih tržišta. Sistemski rizici nisu samo slučajni efekti nekih spoljnih događaja kao što je pad meteora. U stvari, poremećaj finansijskih tržišta tokom ove krize prethodio je širokom padu bruto domaćeg proizvoda. U retrospektivi, suženi spredovi rizika, niska volatilnost i visoke cene aktive i leveridža na početku 2007. godine bili su simptomi latentne nestabilnosti. To nisu bili samo usputni efekti ukroćenijeg poslovnog ciklusa, zaliha just-in-time ili ekonomske globalizacije. Upravo onda kada je rizik izgledao najdalji na osnovu tržišnih indikatora i samozadovoljstvo bilo na vrhuncu, sistem je bio najkrhkiji.

Rezervna banka Australije, Sidnej
Reserve Bank of Australia, Sidney

Već sam pomenuo da kapitalni amortizeri i rezerve moraju da budu ugrađeni u dobrim vremenima tako da se mogu koristiti u lošim vremenima. Na ovaj način, možemo da rešavamo procikličnost rizika u finansijskom sistemu, vremensku dimenziju sistemskog rizika. Pored toga, sistemski rizik ima poprečnu dimenziju i zato moramo da rešimo zajedničke izloženosti/međupovezanosti kod finansijskih institucija. Sistemski rizik koji predstavlja firma teško je merljiv, ali sigurno postoji. Na neki način mora da bude internalizovan.

we keep our guard up even after the recent turmoil recedes from memory.

Most importantly, beyond the input and the models, we have seen weaknesses in governance and incentives within firms. After risk management had apparently tamed risk, management leveraged up in response to incentives to "increase shareholder value" on the basis of short-term results. Building wider shoulders for a road can save lives, but not if drivers simply speed up. Capital requirements are the speed limits of banking.

Regarding the larger-scale process of market discipline, the record here can only be described as disappointing. That individual financial firms failed to manage their risks is bad enough; that their counterparties allowed them to is worse. Market discipline fell short not only with respect to firms, but also with respect to instruments. For instance, why did rating agencies and ultimate investors fail to insist that mortgage originators retain an interest in the mortgage so as to prevent moral hazard? I am told that practice among mortgage lenders differed in Australia.

There is one final respect in which private risk management will not suffice to control risk. Each private firm takes the underlying risk in the financial system as a given. But even if every individual firm keeps its own risks in check, this does not preclude an accumulation of system-wide risk. The control of system-wide risk requires some contribution from the regulatory side.

3. Are capital requirements necessary and sufficient to achieve financial stability?

Yes, capital requirements are necessary; but, no, they are not sufficient. Indeed, I would argue that regulation was only part of the problem and it is only part of the answer. Capital is not enough; regulation is not enough.

As was said of the Bank of England, a bank has "a duty to be rich". Capital requirements should draw on deep pockets that can absorb losses arising from financial and economic stress, thus reducing the risk of spillover from the financial sector to the real economy. Lessons have been drawn by the Basel Committee on Banking Supervision concerning the need to improve the quality of capital, to raise the level of capital and to improve the framework's capture of risk, especially as regards the trading book. And agreement has been reached that both belt and braces are needed, so that one's trousers are held up by a simpler leverage ratio even if the risk-weighted ratio is distorted by an inadequate risk assessment of the assets.

One of the most fundamental improvements introduced by the Basel Committee in its reform package is the macroprudential focus to address both system-wide risks and the procyclical amplification of risks over time. We have learned that those deep pockets I just mentioned need to be made even deeper in good times so that more can be taken from them in bad times.

Capital is a central part of the financial reform, but the crisis highlighted the importance of *liquidity management*. A well capitalised bank is less likely to face a run. And a liquid entity has time to raise more equity. Maturity transformation is the job of banks, but so is maintaining adequate liquidity. The Basel Committee on Banking Supervision has addressed the shortcomings in the liquidity regulatory framework highlighted by the crisis by defining the liquidity buffers needed to promote resilience. Banks should hold a sufficient stock of high-quality liquid assets to be able to survive a month-long loss of access to funding markets. This test is an extension of the one that has been applied in Australia. Banks also need to have a sound funding model that fits their business model.

Capital and liquidity are part of the core financial reforms, but dealing with systemic risk is a multifaceted task, and more measures are on the table. My next question will address this.

4. What is to be done about systemic risk?

We know the right direction even if we have not worked out the precise destination.

Even though the official response to the crisis was necessary to avoid the collapse of the financial system, it has created new challenges. Weak, large institutions have been kept alive and mergers have even made some institutions

Može se razlikovati šest pristupa politike:

- Jedan je predložiti više prudencijalne standarde za velike, povezane i neophodne finansijske firme. Oni se mogu postaviti u pogledu rizikom ponderisane aktive ili prostog koeficijenta leveridža ili za oba, sa ciljem da se snizi verovatnoća stečaja. Oni treba da se postave za firme duž kontinuuma, a ne samo za datu listu institucija koje se smatraju sistemskim.
- Drugi je unapređenje kapaciteta sistema za valjanu reorganizaciju u slučaju stečaja velike, kompleksne, prekogranične institucije - što nije lak zadatak. Kao što je napomenuto, na ovome se aktivno radi na međunarodnom nivou. Kada značajna finansijska institucija propadne, uprkos odgovarajućim zahtevima za kapitalom, režim reorganizacije mora da dozvoli da se stečaj vodi preko granica. Bazelski komitet je preporučio da supervizori pruže kapital ili druge prudencijalne podsticaje za banke da pojednostave strukture grupa koje su isuviše složene da bi dozvolile mirnu i troškovno efikasnu reorganizaciju. Takođe je preporučio jačanje nacionalnih ovlašćenja za reorganizaciju, planiranje za nepredviđene slučajeve prilagođeno zemlji koje uključuje same institucije i ključne matične jurisdikcije i jurisdikcije domaćine, kao i mere da se izbegne zaraza, kao što je dalje jačanje aranžmana nettinga. FSB i BCBS rade intenzivno da unaprede režime reorganizacije i u kompleksnim prekograničnim slučajevima.
- Treći skup je ograničavanje strukture firmi ili obuhvata njihovih aktivnosti. Predlozi obuhvataju izdvajanje sigurnih banaka ili sprečavanje da se institucije u jezgru bave rizičnim aktivnostima, ograničavanjem veličine ili čak unapređenjem jednostavnijih struktura i korišćenjem samostalnih subsidijara. Ovo je oblast u kojoj je diskusija još uvek široko otvorena.
- Četvrto je unapređenje infrastrukture u cilju smanjenja međupovezanosti i otuda troškova neizvršenja. Ovde je takođe ostvaren progres. Mada zahtevi za kapitalom mogu da čuvaju snagu institucije, finansijska stabilnost zavisi od tržišne strukture i njene instalacije, naime kliringa i saldiranja. U Bazelu, Komitet za globalni finansijski sistem i Komitet za sisteme plaćanja i saldiranja dopunjuju Bazelski komitet za superviziju banaka. Kreditni rizik partnera može biti veći nego što je neophodno na OTC tržištima. Privatni interes u ovim tržišnim strukturama ne sme da ometa javni interes za organizovanim berzama ili centralizovanim partnerima, gde je to moguće i gde ispunjavaju striktne standarde.
- Peto je ideja da se oporezuju veličina ili međupovezanost. Dok ovo zaslužuje studiju kao klasično sredstvo postupanja sa eksternalitetom, otvaraju se mnoga pitanja. Da li bi porez završio tako što bi ga plaćali klijenti ili čak akcionari ako je njihova kontrola nad menadžmentom slaba? Da li bi bili prihvatljiviji zahtevi za višim kapitalom i likvidnošću, kao i prudencijalni podsticaji za jednostavnijim strukturama?
- Poslednji pristup je proaktivnija supervizija sistemskih institucija, da bi se obezbedilo održavanje prostora finansijske regulative.

Ali, čak sa svim ovim elementima koji su srž finansijske reforme, mislim da je ova kriza pokazala da valjan način rešavanja sistemskih rizika zahteva dva važna dodatna gradivna bloka: da mikroekonomska politika uzme u obzir akumulisanje finansijske neravnoteže i da međunarodna saradnja bude dovoljna da bi obezbedila konzistentnost. Dva naredna pitanja bave se ovim temema.

5. Kakva je uloga primene?

Da, zahtevi za kapitalom su neophodni, ali, ne, oni nisu dovoljni. Zaista, tvrdim da je regulativa bila samo deo problema i da je samo deo odgovora. Kapital nije dovoljan; regulativa nije dovoljna.

Ovo je pitanje na koje nije dat zadovoljavajući odgovor, ali ima nekih dokaza iz nedavne krize. Slična regulativa je ponekad rezultirala vrlo različitim ishodima u raznim larger. Furthermore, the various support and rescue measures raise immense moral hazard issues if market participants count on their repetition at times of difficulty.

The global financial crisis underscored once again that systemic risk is not external to the functioning of financial markets. Systemic risk is not only about the knock-on effects of some external event like a meteor strike. In fact, the distress in financial markets during this crisis preceded any broad-based downturn in gross domestic product. In retrospect, the muted risk spreads, low volatility and high asset prices and leverage going into 2007 were symptoms of latent instability. They were not just side effects of a tamer business cycle, just-in-time inventories or economic globalisation. Just when risk seemed most remote on the basis of market indicators and complacency was at its highest, the system was most fragile.

I already mentioned that capital buffers and provisions need to be built up in good times so that they can be drawn down in bad times. In this way, we can address the risk of procyclicality in the financial system, the time dimension of systemic risk. In addition, systemic risk has a cross-sectional dimension, and we must address the common exposures/ interlinkages among financial institutions. The systemic risk that a given firm poses is hard to measure, but it surely exists. Somehow it must be internalised.

Six policy approaches can be distinguished.

- One is to propose higher prudential standards for large, connected and indispensable financial firms. These can be set in terms of risk-weighted assets or a simple leverage ratio or both, with the aim of lowering the probability of failure. These should be set for firms along a continuum, not for a set list of institutions deemed systemic.
- Second is to improve the system's capacity for an orderly resolution to a big, complex, cross-border institution's failure - no easy task. As noted, this is being actively worked on at the international level. When an important financial institution fails, appropriate capital requirements notwithstanding, resolution regimes must allow the failure to be managed across borders. The Basel Committee has recommended that supervisors provide capital or other prudential incentives for banks to simplify group structures that are too complex to permit orderly and cost-effective resolution. It has also recommended the strengthening of national resolution powers, institution-specific contingency planning involving the institutions themselves as well as critical home and host jurisdictions, and measures to avoid contagion, such as the further strengthening of netting arrangements. Both the FSB and the BCBS are working hard to improve the resolution regimes even in complex cross-border cases.
- A third set is to limit the structure of firms or the scope of their activities. Proposals include splitting off safe banks or preventing core institutions from engaging in risky activities, limiting size or even promoting simpler structures and the use of standalone subsidiaries. This is an area where the discussion is still wide open.
- Fourth is to improve infrastructure in order to reduce interconnectedness and therefore the cost of default. Here, too, there has been progress. While capital requirements can keep institutions strong, financial stability depends on market structure and its plumbing, namely clearing and settlements. In Basel, the Committee on the Global Financial System and the Committee on Payment and Settlement Systems complement the Basel Committee on Banking Supervision. Counterparty credit risk can be larger than necessary in over-the-counter markets. A private interest in this market structure must not trump the public interest in organised exchanges or centralised counterparties, where these are feasible and

Yes, capital requirements are necessary; but, no, they are not sufficient. Indeed, I would argue that regulation was only part of the problem and it is only part of the answer. Capital is not enough; regulation is not enough.

zemljama. Ovo može da bude zbog nekoliko faktora: struktura finansijskog sistema, stepen sofistikacije, različiti modeli poslovanja, itd. Jedan od njih, verujem, je rigoroznost sa kojom se primenjuju pravila.

Naravno, banke u ekonomiji koja doživljava bum aktive hranjen kreditima biće pogođene padom. Nijedan supervizor ne može biti siguran da će održati finansijsku stabilnost kada cene nekretnina padnu za 60% ili 70%.

Kada smo to rekli, moramo da priznamo da nije bilo jednostavnog mapiranja iz makroekonomije poremećaja bankarskog sistema tokom nedavne krize. Istina, banke u zemljama sa bumom nekretnina i padom bile su pogođene. Ali banke u SAD i Velikoj Britaniji, koje su stavile svoje izloženosti prema nekretninama u mehanizme sa specijalnom namenom, bile su više pogođene. U isto vreme, neke švajcarske i nemačke banke bile su jako pogođene, ne izloženostima prema nemačkim ili švajcarskim zajmoprimcima, već izloženošću prema nekretninama u SAD. Ono što se pokazalo skupim u ovim slučajevima bile su prekogranične investicije u sekjuritizovanu aktivu.

Ove opservacije ukazuju na značaj primene. Važna je snaga supervizije a ne samo donošenje pravila, kao što se pokazalo u Australiji i Kanadi. Nasuprot ideji da striktna supervizija ograničava konkurenciju, kriza pokazuje da finansijski sistemi zemalja sa striktnom, rigoroznom supervizijom bolje prolaze.

Postoji druga implikacija neperfektnog mapiranja između matične zemlje i izloženosti poremećene aktive - to jest, ranjivost bankarskog sistema mora da se ocenjuje u odnosu ne samo na kretanje kredita i aktive u matičnoj zemlji, već takođe u odnosu na niz zemalja prema kojima je bankarski sistem izložen. Završna implikacija, na koju ću se za trenutak vratiti, jeste da je međunarodna saradnja supervizije od vitalnog značaja.

meet strict sound standards.

- Fifth is the idea to tax bigness or interconnectedness. While this deserves study as a classic means of dealing with an externality, many questions arise. Would the tax end up being paid by customers, or even by shareholders if their control over management is weak? Wouldn't higher capital and liquidity requirements, and prudential incentives for simpler structures, be preferable?
- The last approach is to supervise systemic institutions more proactively, to ensure that the perimeter of financial regulation is maintained.

But, even with all these elements that are the core of financial reform, I think this crisis has shown that addressing system-wide risks properly requires two important additional building blocks: that macroeconomic policies take into account accumulating financial imbalances, and that international cooperation be sufficient to ensure consistency. Two upcoming questions address these themes.

5. What is the role of implementation?

This is a question that has not been satisfactorily answered, but there is some evidence from the recent crisis. Similar regulations have sometimes resulted in very different outcomes in different countries. This may be due to several factors: the structure of the financial system, the degree of sophistication, the different business models, etc. One of them, I believe, is the rigour with which rules were enforced.

Of course, banks in any economy that experiences a credit-fuelled asset boom will suffer in the bust. No supervisor can be confident of maintaining financial stability when real estate prices fall by 60% or 70%.

That said, we have to recognise that there was

Sidney

6. Da li je usko bankarstvo rešenje za problem finansijske nestabilnosti?

Generalno, ne.

Iz istorijske perspektive, nije iznenađujuće što suženo bankarstvo uživa obnovljenu privlačnost posle najnovijeg buma i pada gonjenog kreditima. Simon je izneo svoju tvrdnju u pogledu sličnog trenutka u 1930-tim godinama. Još jednom je demonstracija đavolskog potencijala ekscesnog uzimanja rizika vodila predlogu da se kreditiranje izgna iz novčanog hrama.

Međutim, usko bankarstvo bi samo obezbedilo da se kreditni rizici pomere preko regulatorne oblasti, sa rezultatom da finansijska nestabilnost onda udari izvan tih granica. Ekonomija zavisi od neprestanog toka kredita ne samo od sigurnih depozita i nesmetanog plaćanja. Ozbiljna nestabilnost može da nastane iz rizičnih kvazi-banaka koje rastu brže od sigurnih banaka tokom buma, samo da bi se brzo smanjile tokom krize.

To je slučaj sa industrijom fondova novčanog tržišta u SAD. Mada autonoman tržišni proces, on se podelio na striktno usko bankarstvo ("samo upravljanje sredstvima") i labaviji model ("primarni" fondovi). Propast Lehmana vodila je u juriš iz primarnih fondova na državne fondove. "Ovo je pretilo remetilačkim sužavanjem kredita bankama i firmama. Vlasti SAD pružile su podršku kreditora poslednje instance i ex post osiguranje depozita da bi se industrija stabilizovala.

Nedavni predlozi SAD - takozvano Vokerovo pravilo - da se jezgro finansijskih institucija uzdrži od angažovanja u poslovanju sa hedž fondovima i sa privatnim akcijskim i vlasničkim trgovanjem ima prednost ograničavanja osiguranih depozita samo za finansiranje tradicionalnih bankarskih aktivnosti. Ali takvi planovi bi stavili težak teret na nadgledanje granica firme i oni mogu da stvore više kompleksnosti i međupovezanosti u finansijskom sistemu. Gde bankarstvo predstavlja veći deo finansijskog sistema, takve restrikcije mogu da ograniče snabdevanje sredstava rizičnijim dugoročnim aktivnostima koje mogu da dobiju finansiranje pod odgovarajućim sistemom upravljanja rizcima.

Usko ili uže bankarstvo mogu da nađu svoje mesto u nekim slučajevima i supervizori treba da imaju kapacitet da ograničavaju neke aktivnosti. Ali ja sam uveren da je ono odgovarajuće u opštem slučaju i mislim da zahteva pažljivije razmatranje.

Možda treba postaviti pitanje: da li postoji odgovarajući model za globalno bankarstvo?

Ovde ponovo opipavamo odgovor mada ima lekcija iz krize.

Nedavno iskustvo je sigurno ukazalo na neka ograničenja modela finansiranja u kome banke uzimaju velefinansiranje na globalnim tržištima i redistribuiraju ih preko valuta i preko granica. Posle sloma bez presedana niskorizične arbitraže, likvidnost više nije mogla da se brzo i jeftino transformiše iz jedne valute u drugu. Učeći iz te lekcije, banke sada nastoje da nađu stabilnije i diversifikovanije depozitne baze. One koje posluju po decentralizovanom multinacionalnom modelu, koje se većim delom oslanjaju na subsidijare bogate stabilnim ritejl depozitima, izašle su u boljem stanju od banaka sa velemodelima.

Međutim, moramo bolje razumeti šta je funkcionisalo a šta nije funkcionisalo. Nekoliko radnih grupa Komiteta za globalni finansijski sistem uzimaju aspekte ovog pitanja u odgovor na pitanja koja su postavljena u Bordu za finansijsku stabilnost. Zvaničnik Rezervne banke Australije predsedava jednom od ovih grupa.

7. Da li je finansijskoj stabilnosti potrebna pomoć monetarne politike?

Odgovor je da, ali se mora naglasiti da je način na koji je pitanje postavljeno od značaja. Pitanje nije da li monetarna politika treba da cilja cene aktive. Pitanje je kako monetarna politika može da bude više simetrična i da se naslanja na gomilanje finansijskih neravnoteža.

Primamljivo je sačiniti čist tinbergijanski zadatak kod koga se, barem u normalnim okolnostima, stabilnost cena obezbeđuje politikom kamatne stope dok se finansijska stabilnost obezbeđuje makrofinansijskom politikom, bilo da su zahtevi za kapitalom ili kreditna ograničenja opšta ili specifična po sektorima. U ovoj koncepciji, finansijska stabilnost ne bi zahtevala monetarnu politiku.

no simple mapping from the macroeconomy to distress in the banking system during the recent crisis. True, banks in countries with real estate booms and busts suffered. But those in the United States and the United Kingdom, which had placed their real estate exposures in special purpose vehicles, suffered more. At the same time, some Swiss and German banks were hit hard, not by exposures to German or Swiss borrowers, but rather by exposures to US real estate. What proved costly in these cases was cross-border investment in securitised assets.

These observations point to the importance of enforcement. The strength of supervision mattered, not just the rule-setting, as demonstrated by Australia and Canada. Contrary to the notion that strict supervision restricts competiveness, the crisis shows that the financial systems of countries with strict, rigorous supervision came out better.

There is another implication from the imperfect mapping between home country and exposure to troubled assets - that is, the vulnerability of the banking system must be assessed in relation not only to credit and asset developments in the home economy, but also to the array of countries to which the banking system is exposed. A final implication, to which I will return in a moment, is that international coordination of supervision is vital.

6. Is narrow banking the solution to the problem of financial instability?

Not in general.

In a historical perspective, it is not surprising that narrow banking is enjoying renewed appeal after the latest credit-fuelled boom and bust. Simon made his argument at a similar moment in the 1930s. Once again, a demonstration of the devilish potential of excessive risk-taking has led to proposals to cast out lending from the temple of money.

However, narrow banking would only ensure that credit risks move beyond the regulatory perimeter, with the result that financial instability would then strike outside those confines. The economy depends on a sustained flow of credit, not just on secure deposits and smooth payments. Grave instability can arise from risky quasi-banks that grow faster than safe banks during the boom, only to shrink rapidly during the crisis.

A case in point is the US money market fund industry. Through an autonomous market process, it divided itself into strict narrow banking ("government only" funds) and a looser model ("prime" funds). Lehman's failure led to a run from prime funds into government funds. This threatened a disruptive contraction of credit to banks and firms. The US authorities extended lender of last resort support and ex post deposit insurance to stabilise the industry.

Recent US proposals - the so-called Volcker rule - to keep core financial institutions from engaging in businesses such as hedge funds, private equity and proprietary trading have the merit of restricting insured deposits to funding more traditional banking activities. But such plans would put a heavy burden on policing the borders of the firm, and they may create more complexity and interlinkages in the financial system. Where banking accounts for the larger part of the financial system, such restrictions could limit the supply of funds to riskier long-term activities that may merit financing under an appropriate risk management system.

Narrow or narrower banking may have its place in some cases, and supervisors should have the capacity to restrict some activities. But I am not convinced that it is appropriate in the general case, and I think it requires more careful consideration.

Perhaps the question should be posed: is there an appropriate model for global banking?

Here again we are groping for an answer, although there are lessons from the crisis.

Recent experience has certainly highlighted some of the limitations of a funding model that has banks borrowing wholesale funds in global markets and redistributing them across currencies and borders. Following the unprecedented breakdown of low-risk arbitrage, liquidity could no longer be readily and cheaply transformed from one major currency into another. Learning from that lesson, banks are now seeking out more stable and more diversified deposit bases. Those that operated on a decentralised multinational model, relying mostly on subsidiaries endowed with stable retail deposits, have emerged in better shape

Kao relevantni, mogu se navesti primeri iskustva Hong Konga i Španije u rešavanju ciklusa nekretnina bez pribegavanja politici kamatnih stopa. U toku 1990-tih godina prinosi na hongkonškom novčanom tržištu u osnovi su određivale Federalne rezerve. Tokom 2000-tih godina, evro kamatne stope bile su prilagođene uslovima evro zone. U oba slučaja, tržišta nekretnina su istrpela ciklus buma i pada koji je pretio da devastira bankarski sistem. Vlasti Hong Konga oborile su maksimum koeficijenata kredita prema vrednosti u kreditiranju nekretnina, dok su španske vlasti nastojale da se izgrade amortizeri putem anticipativnog rezervisanja. U oba slučaja, banke su se pokazale mnogo otpornije prema propasti nego što bi inače bile.

Ali, generalno, prudencijalna politika nije dovoljna da održi finansijsku stabilnost. Pošto je to tako, regulativa bi bila preopterećena bez izvesne pomoći monetarne politike. Najzad, kratkoročna kamatna stopa postavlja trošak leveridža koji istaknuto figurira u svakom balonu aktive koji naduvavaju dugovi. Ovde u Australiji, politika kamatne stope Rezervne banke u 2003. godini ispravno je grešila u pravcu oštine suočena sa snažnim rastom cena kuća i kredita. Bilo je zabrinutosti u nekim krugovima u to vreme da je to napuštanje cilja cenovne stabilnosti. U svetlu iskustva, dinamiziranje politike kamatne stope bolje se interpretira kao ostvarenje iskazanog cilja Rezervne banke cenovne stabilnosti tokom poslovnog ciklusa.

8. Da li su centralne banke opremljene za svoju ulogu u finansijskoj stabilnosti?

Moje gledište je da većina njih jeste, ali da se njihovo stanje pripravnosti može značajno unaprediti.

Lako se može videti da neke centralne banke imaju ili dele odgovornost za superviziju banaka dok druge nemaju. Stvari se razlikuju na obe strane Tasmanijskog mora; velike centralne banke ASEAN-a i Rezervna banka Indije su takođe supervizori banaka. Koreja i Japan su u poziciji koja je više analogna onoj u Velikoj Britaniji, sa centralnim bankama odvojenim od supervizora. Ne treba da bude suviše kontroverzno ako se kaže da su centralne banke koje imaju i ovlašćenje supervizora dobro pozicionirane da dodaju makro značaj svojoj superviziji od firme do firme.

Nasuprot tome, one bez takvih ovlašćenja moraće da nađu druge načine da utiču na makroprudencijalne aranžmane. Zaista se može tvrditi da su azijske centralne banke bile ispred krive korišćenjem makroprudencijalnih alata. Bez obzira na to da li je institucionalni zadatak prudencijalne supervizije u centralnoj banci ili ne, nedavna finansijska kriza istakla je veliku ulogu koje centralne banke treba da imaju u politici finansijske stabilnosti. Ovo je otvorilo značajna pitanja o mandatima, ekspertizi, alatima, imunitetima i strukturama upravljanja:

- Šta je osnova mandata da se brinu o finansijskoj stabilnosti? Da li postoji pouzdana zakonska osnova ili jasno javno razumevanje odgovornosti da se obezbedi finansijska stabilnost?
- Da li centralna banka ima potrebnu ekspertizu i resurse? Mogu li modeli i gledišta centralne banke da se prilagode ocenjivanju finansijskih ranjivosti i analizi mogućih odgovora?
- Da li centralne banke imaju potrebne alate? Da li su oni zarđali od neupotrebe, ili je potrebno ustanoviti administrativnu i zakonsku osnovu za nove?
- Da li je koncept nezavisnosti centralne banke adekvatan za nove odgovornosti? Da li je potrebno proširenje zakonskog imuniteta ili promene u nadležnosti zakonskog nadzora da bi sprovodile svoje odgovornosti za

Moramo se setiti da reči "Ovaj put je drugačije" predstavljaju neke od istaknuto najskupljih reči u celokupnom engleskom jeziku. Što više uveravamo sebe da smo savladali rizik i neizvesnost i da smo sigurniji da smo naučili lekcije iz prošlosti, postajemo ranjiviji prema ubistvenoj samouverenosti i verovatnoći da će stvari ponovo poći nezamislivo naopako.

than banks with wholesale models.

However, we need to understand better what has worked and what has not worked. Several working groups of the Committee on the Global Financial System are taking up aspects of this question in response to the questions posed in the Financial Stability Board. An official of the Reserve Bank of Australia chairs one of these groups.

7. Does financial stability need help from monetary policy?

The answer is yes, but it must be emphasised that the way the question is posed is important. The question is not whether monetary policy should target asset prices. The question is how monetary policy can be more symmetrical and lean against the build-up of financial imbalances.

It is tempting to make a neat Tinbergian assignment in which, under normal circumstances at least, price stability is assured by interest rate policy while financial stability is assured by macrofinancial policies, be they capital requirements or credit restrictions, general or sector-specific. In this conception, financial stability would have no claim on monetary policy.

As cases in point, one could cite the Hong Kong and Spanish experiences in dealing with real estate cycles without resort to interest rate policy. In the 1990s, Hong Kong money market yields were basically set by the Federal Reserve. In the 2000s, euro interest rates were set to euro area conditions. In both cases, real estate markets suffered a boom and bust cycle that threatened to devastate the banking system. The Hong Kong authorities lowered maximum loan-to-value ratios in real estate lending, while the Spanish authorities sought to build up buffers through forward-looking provisioning. In both cases, banks proved more resilient to the eventual bust than they would otherwise have been.

We must recall that the words "It's different this time" are some of the most demonstrably expensive words in the entire English language. The more we convince ourselves that we have mastered risk and uncertainty and the more confident we are that we have learned the lessons of the past, the more vulnerable we become to lethal overconfidence and the probability that things will again go unimaginably wrong.

But, in general, prudential policies do not suffice to maintain financial stability. This being the case, regulation would be overburdened without some help from monetary policy. After all, the short-term interest rate sets the cost of leverage, which figures prominently in any debt-fuelled asset bubble. Here in Australia, the Reserve Bank's interest rate policy in 2003 rightly erred on the side of tightness in the face of strong growth in house prices and credit. There was concern in some quarters at the time that this was straying from the goal of price stability. In the light of experience, this shading of interest rate policy is better interpreted as having realised the Reserve Bank's stated goal of price stability over the business cycle.

8. Are central banks equipped for their financial stability role?

My view is that most are but that their state of readiness can be significantly improved.

It is easily observed that some central banks have or share responsibility for bank supervision while others do not. Matters differ on either side of the Tasman Sea; the major ASEAN central banks and the Reserve Bank of India are all also bank supervisors; Korea and Japan are in a position more analogous to that of the United Kingdom, with a separation between central banks and supervisors. And it should not be too controversial to say that central banks that also have supervisory powers are well placed to add a macro overlay to their firm-by-firm supervision.

By contrast, those without such powers will need to find other ways to influence macroprudential settings. Indeed, one might argue that the Asian central banks have been ahead of the curve with the use of macroprudential tools. No matter whether the institutional assignment of prudential supervision is to the central bank or not, the recent financial finansijsku stabilnost?

- Da li su aranžmani za deobu gubitaka dovoljno robusni da preuzmu rizike bilansa stanja koje izaziva politika kao što su nedavne mere da se obnovi finansijska stabilnost?
- Da li su centralnoj banci potrebne promene u njenim upravljačkim aranžmanima, analogno odvajanju unutar Rezervne banke Australije između njenog Komiteta za monetarnu politiku i njenog Borda za platni sistem?

U Komitetu za globalni finansijski sistem u toku je rad na nastojanju da se katalogizuje ono što je urađeno i šta funkcioniše. U isto vreme, u toku su napori Foruma za upravljanje u centralnim bankama o internim aranžmanima za rad centralne banke na finansijskoj stabilnosti. Nadamo se da ćemo ubrzo imati bolje odgovore na ovom frontu.

9. Da li je dovoljno da svako održava svoju kuću u redu?

Ne, nama je potrebna međunarodna koordinacija. Upravo onako kao što upravljanje rizikom u pojedinačnim firmama ne doprinosi stabilnosti finansijskih tržišta, isto tako makroekonomska i finansijska stabilnost na nacionalnom nivou ne doprinosi nužno globalnoj finansijskoj stabilnosti.

Dozvolite mi da istaknem jedan broj ključnih koraka koji se preduzimaju za jačanje međunarodne koordinacije.

Prvo, perimetar međunarodne koordinacije se proširio. Više zemalja je pristupilo u odgovor na krizu. Dozvolite mi da naglasim da je nedavno proširenje međunarodnih diskusija na velike nove ekonomije naročito dobro i efikasno dejstvovalo.

Drugo, G20 su dali politički impuls finansijskoj regulatornoj reformi i političkoj saradnji. Ovaj prodor će učiniti koherentnijim makroekonomske i finansijske politike po zemljama. Naročito, ovi postupci uzajamnog ocenjivanja koji je u toku predstavljaju obećavajući signal obaveza zemalja G20 da sarađuju na sporovođenju šire politike.

Treće, Bord za finansijsku stabilnost ima jasan mandat da poveća međunarodnu saradnju donosilaca politike, finansijskih regulatora, supervizora i donosilaca standarda. Bazelski proces, koji pokriva široku skalu kooperativnih napora između bankarskih supervizora, eksperata centralnih banaka za finansijsko tržište i supervizora osiguranja depozita i osiguranja, deo su napora koje koordinira Bord za finansijsku stabilnost. Ovi novi institucionalni aranžmani već su počeli da daju značajne rezultate. Jedan primer je formiranje kolegijuma supervizora za koordinaciju nadzora nad onim firmama koje prelaze nacionalne granice.

Četvrto, novi procesi uzajamnog ocenjivanja obezbediće da međunarodno dogovorena pravila budu primenjena u svim jurisdickijama. Da bi se unapredilo pridržavanje zajedničkih standarda, Bord za finansijsku stabilnost vodi dva stručna pregleda: jedan po temama i drugi po konkretnim ekonomijama. Bazelski komitet takođe nadgleda stručne preglede.

Ovo su sve nepotpuni mehanizmi, bez sumnje. Ali oni daju praktičan izraz uvidu da globalne firme i globalna tržišta zahtevaju globalnu saradnju u regulativi, superviziji i makroekonomskoj politici.

10. Da li će sledeći put biti drugačije?

Sklon sam da mislim da, ukoliko ne postanemo samozadovoljni i nastavimo da radimo na reformi finansijske regulative, odgovor može biti pozitivan.

Ima mnogo dobrih razloga da se nadamo da će sledeći put biti drugačije. To se može sumirati na sledeći način:

- U regulativu ugrađujemo znatno više otpornosti, naročito u pogledu zahteva za kapitalom i likvidnošću.
- Znatno bolje vodimo računa o sistemskom riziku u njegove dve glavne dimenzije, vremenskoj dimenziji i poprečnoj dimenziji.
- Barem mislimo o tome, ako i nismo u potpunosti saglasni, koji se doprinos finansijskoj stabilnosti može očekivati od monetarne, budžetske i poreske politike.
- Pojačali smo strukture međunarodne saradnje i proširili učešće u njima do sada isključenih ekonomija.
- Sistematski pretražujemo finansijska tržišta tražeći podatke o osnovnim ranjivostima i

crisis has highlighted the prominent role that central banks should have in financial stability policy. This has raised important questions about mandates, expertise, tools, immunities and governance structures:

- What is the basis of the mandate to attend to financial stability? Is there a sound legislative basis or a clear public understanding of the responsibility to ensure financial stability?
- Does the central bank have the requisite expertise and resources? Can the models and points of view of the central bank be adapted to the assessment of financial vulnerabilities and the analysis of possible responses?
- Does the central bank have the requisite tools? Are these rusty from lack of use, or does the administrative or legal basis for new ones need to be established?
- Is the central bank's notion of independence adequate for new responsibilities? Does it need an extension of its legal immunities or changes in the purview of legislative oversight to carry out its financial stability responsibilities?
- Are loss-sharing arrangements robust enough to take on the balance sheet risks entailed by policies such as recent measures to restore financial stability?
- Does the central bank need changes to its governance arrangements, by analogy with the separation within the Reserve Bank of Australia between its Monetary Policy Committee and its Payments System Board?

Work is under way in the Committee on the Global Financial System that seeks to catalogue what has been done and what has worked. At the same time, there are efforts ongoing in the Central Bank Governance Forum on the internal arrangements for central bank work on financial stability. We hope to have better answers on this front soon.

9. Is it enough for everyone to keep his own house in order?

No, we need international coordination. Just as risk management at individual firms does not add up to the stability of the financial markets, so, too, macroeconomic and financial stability at the national level does not necessarily add up to global financial stability.

Let me just highlight a number of key steps that are being taken to strengthen international coordination.

First, the perimeter of international coordination has widened. More countries have joined in the international response to the crisis. Let me emphasise that the recent enlargement of international discussions to major emerging economies has worked particularly well and efficiently.

Second, the G20 has provided a political impetus for financial regulatory reform and policy cooperation. This push will make for more coherent macroeconomic and financial policies across countries. In particular, the new mutual assessment exercise that is under way is a promising signal of the commitment of the G20 countries to cooperate on broader policies.

Third, the Financial Stability Board has a clear mandate to increase the international coordination of policymakers, financial regulators, supervisors and standard setters. The Basel Process, which covers a wide range of cooperative efforts among banking supervisors, central bank financial market experts, and deposit insurance and insurance supervisors, is part of the efforts coordinated by the Financial Stability Board. These new institutional arrangements have already started to produce significant results. One example is the formation of colleges of supervisors to coordinate the oversight of those firms that span national boundaries.

Fourth, new mutual assessment processes will ensure that internationally agreed rules are enforced in all jurisdictions. To promote adherence to common standards, the Financial Stability Board is conducting two kinds of peer review: one on themes and another on particular economies. The Basel Committee is also overseeing peer reviews.

All these are imperfect mechanisms, no doubt. But they give practical expression to the insight that global firms and global markets require global cooperation in regulation, supervision and macroeconomic policy.

10. Will it be different next time?

I am inclined to think that, provided we do not become complacent and we continue to neodrživom razvoju.

Uz sve ovo i navodeći iz nedavnog rada Reinharta i Rogoffa, moramo se setiti da reči "Ovaj put je drugačije" predstavljaju neke od istaknuto najskupljih reči u celokupnom engleskom jeziku. Što više uveravamo sebe da smo savladali rizik i neizvesnost i da smo sigurniji da smo naučili lekcije iz prošlosti, postajemo ranjiviji prema ubistvenoj samouverenosti i verovatnoći da će stvari ponovo poći nezamislivo naopako.

Zato najbolji način da se obezbedi da sledeći put zaista bude drugačije jeste jačanje finansijskog sistema i stalna budnost, da bi se po svaku cenu izbegla pomisao da je ovaj put drugačije.

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work on the reform of the financial regulation, the answer may be positive.

There are many good reasons to hope that it will be different next time. These can be summarised as follows:

- We are building into the regulations much more resilience, especially with regard to capital and liquidity requirements.
- We are taking much better account of system-wide risk in its two major dimensions, the time dimension and the cross-sectional dimension.
- We are at least thinking about, if not entirely in agreement on, what contribution to financial stability can be expected from monetary, fiscal and tax policy.
- We have strengthened the structures of international cooperation and have broadened participation in them to hitherto excluded economies.
- We are systematically scanning financial markets for evidence of underlying vulnerabilities and unsustainable developments.

All that said, and borrowing from the recent work by Reinhart and Rogoff, we must recall that the words "It's different this time" are some of the most demonstrably expensive words in the entire English language. The more we convince ourselves that we have mastered risk and uncertainty and the more confident we are that we have learned the lessons of the past, the more vulnerable we become to lethal overconfidence and the probability that things will again go unimaginably wrong.

So the best way to ensure that the next time really will be different is to strengthen the financial system and remain vigilant, so as to avoid, at all costs, the thought that this time is different.

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