



a needs to develop a debt market

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As the infrastructure of the financial system in the country is required to reflect the development of the real economy India has developed as a rich poor country and our financial system is required to meet the needs of small businesses, farmers, individuals, etc. Pending the development of debt markets, the banking system is being asked to fulfill the job of debt markets and the government's financial inclusion agenda, which is a tall order. In addition, we have developments in regulations, which would compound the issue further.

India will need huge amounts of funds for its development. As the government grapples with the implications of bringing public finances under control and of improving execution efficiency, the role of the private sector in this domain is likely to keep growing. The Twelfth Five Year Plan put in place by the government envisages \$100 billion of infrastructure investments over the period 2012-2017. Of that, a significant amount is expected to come from the private sector. This is a \$100-billion jump from the average private sector share of the overall rate of investment in the Eleventh Five Year Plan period. Of the \$500 billion worth of private sector investments in infrastructure, \$300 billion is projected to be funded through debt.

How does the private sector raise this debt? Through infrastructure projects are long gestation projects requiring long term financing. This would typically be the domain of the capital markets. Will the debt market be able to deliver these funds? That seems unlikely. At a mere 5% of GDP, the market for non-government bonds in India remains underdeveloped despite more than a decade of effort. This compares with a corporate bond market size of 4% of GDP for China and 3% for Brazil.

Could this change? Given the experience in the past decade, it would be optimistic to expect a dramatic turnaround in the debt market's fortunes going forward. The reasonable stagnation in the bond market is known. Here's a quick recap of what has held back the development of a debt market.



states combined run a deficit of close to 8% of GDP and finance it largely through bonds and some other fixed income instruments, leaving only a small share of effective domestic savings for private borrowers. In short, the government is disproportionately large player in the domestic bond market. It covers a major share of government issuance in the domestic bond market works out to about 85% for the world as a whole; for India the proportion is 90%.

The government's dominance of the bond market is not confined to the quantum of sovereign bond supply, but regulations and practices that hamper efficient and timely issuance and the development of a meaningful yield curve spanning the maturity spectrum. The statutory liquidity ratio (SLR) mandate creates a captive market for government bonds that influences prices from mark-to-market valuations. This curb secondary market trading and liquidity.

Given the captive market for its bonds, the government restricts the bulk of its bond issuance to the longer tenors in order to push redemption pressures resulting in the shorter segments of the yield curve remaining illiquid. Roughly 75% of the settlement volumes in central government dated securities are concentrated in the 10-year and 12-year segments. 15 securities (concentrated in the maturity range of 5-20 years) account for over 90% of the volume. Except for about 6-8 securities at a time for which two way quotes are available in the

At the heart of the debt market's woes lies the government's large fiscal deficit. The household sector's savings in financial assets is about 11% of GDP and the corporate sector saves 8% of GDP. The Centre and states combined run a deficit of close to 8% of GDP and finance it largely through bonds and some other fixed income instruments

market, other parts of the yield curve represent securities that are not actively traded. In the absence of a representative sovereign yield curve, markets for instruments like swaps and interest rate derivatives, which would complement the growth of a robust bond market, have also not developed.

Regulations specific to the domestic corporate bond market and pension funds whose liability structures enable them to invest in long-term bonds restrict their participation. For instance, at least 75% of investments in debt instruments by insurance companies need to be in AAA rated paper and investments can only be made in instruments with a minimum maturity of ten years. Regulations like these push several attractive infrastructure investment options outside the ambit of insurance companies and pension funds.

These problems are unlikely to go away in the near term. In the absence of a sharp decline in the savings and states' demand for funds, the compulsion to overhaul regulations like the SLR will remain muted. Thus, we can assume

that at least over the next three years, the bond market is unlikely to become an active conduit of delivery of long-term funds.

So, in the near future, money will have to come from banks. This is not an easy task as they will simultaneously have to provide long-term funds, serve the working capital needs of the economy, enable households to leverage and purchase their dream homes, cars and finally take the financial agenda forward. In short, banks have to make available a huge amount of credit to the economy. Going by some estimates, the working capital demand alone over the next five years could total close to \$1 trillion.

Add to this the fact that Indian banks, despite not having toxic business models, products, are looking at capital adequacy regulations that are tougher than the West. The advent of Basel III norms as a global enabler by themselves will not only raise the capital requirements of banks but will also put pressure on them to improve their capital mix. Basel III keeps the minimum total capital requirement unchanged at 8% of risk weighted assets (RWA) but introduces a capital conservation buffer of 2.5% of RWA, raising total capital require-

ment to 10.5%. Further, the internal norms of banks limit a minimum Tier I capital of 6.0% against 4.5% provisionally, which at least 4.5% must come from common equity.

RBI, however, has imposed tighter capital requirements than Basel III. Banks in India are required to operate at a higher minimum capitalisation level (9% including capital conservation buffers) as compared to 8% according to international standards. Going by the RBI guidelines, banks are required to maintain minimum Tier I capital of 7.0% (that is a percentage point above the Basel stipulation) of minimum 4.5% against the 3% ratio that will be mandated by RBI. (Basel stipulates) must come from common equity only. Based on these norms, the additional common equity requirements for the banking system over the next few years will likely total \$1.1 trillion. Further, with regard to the overall leverage ratio of a bank, RBI mandates a minimum 4.5% against the 3% ratio that will be mandated by RBI.

In addition, risk weights prescribed by RBI across asset classes are more stringent than international guidelines. Take the case of mortgage loans secured by residential property. The risk weight for this category in India is between 50% to 75%, depending on the quantum of the loan. Basel III norms set this category in India to be between 30% to 75%, depending on the size of the loan. In some countries, the risk weight at its mortgages is as low as 35%. Further, while under international norms lending to public sector enterprises can attract a weight as low as 0%, and be treated as a claim on the sovereign according to international standards, RBI requires domestic banks to maintain risk weights of 20% to 100% based on

the external credit rating of the PSU and so on. Also, SLR as its remuneration would be taken in its entirety as a near term asset, otherwise bank's lending capacity will be impacted.

Indian banks seem to be maintaining high net interest margins and are able to reduce them and compensate for this by reducing costs. Let us be clear: the margins should be low. The supervision costs likely to be incurred on financial inclusion and margins will be further squeezed.

From a risk perspective, provisioning requirements could rise as macro-liquidity tightens on the merits of inclusive growth and greater credit outreach. It is possible to get a tentative idea of the additional provisioning required by the priority sector as it exists today could work as a proxy for the likely pattern of impairment for the loans related to financial inclusion. Based on RBI statistics, the gross NPA ratio for priority sector loans is about 1.5% and for the rest of the sector is more than twice the gross NPA ratio in non-priority sector.

While the NPA ratios reflect the intrinsically higher risk in priority sector loans, the RBI's provisioning for capital adequacy and the provisioning requirements are disproportionately more than international norms. Lending by RBI is currently required to be made in the priority sector. With banks having to step up their lending in the priority sector areas, the risk levels as well as the risk related capital gap could increase. The additional common equity exposures are expected to be economical for the borrower in this segment but may not be so for the lender. To absorb the actual risk premium that such lending warrants. This could result in a higher risk premium that returns on the capital deployed for these exposures, which is tough in a world where the returns are low. To increase their capital requirements.

What are the implications of all this? In conclusion, given that our banking system will have to dilute their equity base to comply with capital requirements. The casualty will be the returns on the equity. The returns could go down as low as 12-14%. Given global competition for capital and risk appetite attached to India, it is unlikely banks will be able to raise capital on favourable terms.

In conclusion, since our banking system did not participate in the crisis and now does it have the right to demand a desirable to burden banks with regulations that are more restrictive than those for the rest of the world that caused the crisis and has the problem? I will follow Basel III guidelines. Indian banks will be weight as low as 0% and be treated as a claim on the world of ROE of 17% plus.

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