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* Views expressed are those of the authors and do not necessarily reflect official positions of De Nederlandsche Bank.

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Abstract

We use granular portfolio data to study how European Union (EU) banking systems adjust their bond portfolios to regulatory solvency shocks. When solvency declines, banks increase their exposure to domestic bonds, especially higher yielding sovereign bonds. These effects are stronger in banking systems where variable pay accounts for a larger share of senior management compensation. Risk-shifting and regulatory arbitrage best explain these results. We also find that bonds owned by less-well capitalized banking systems trade at a discount, suggesting that the overhang of future asset liquidations at distressed intermediaries increases current bond yields.

Keywords: Bank regulation, risk-shifting, intermediary asset pricing

JEL classifications: G11, G12, G15, G21

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1 Introduction

The presence of government guarantees and the free-rider problem among dispersed creditors motivate financial regulations that represent the interests of creditors and limit bank-risk taking when bank solvency declines (Dewatripont and Tirole, 1994). But the recent joint distress of banks and sovereigns within the European Union (EU) and the ensuing cross-border spill-overs across EU member states suggest that financial regulation also needs to represent the collective interests of member states within a currency union. In the absence of such regulations, the expectation of assistance or debt forgiveness from other member states can weaken an individual sovereign’s incentives to limit risk taking within its own banking system, as the individual sovereign shares the potential cost of this risk-taking with other members of the currency union. Moreover, the more robust “collective government guarantee” provided by the currency union can actually amplify bank-risk taking incentives when solvency declines (Farhi and Tirole, 2018).

Therefore, in order to represent better the collective interests of member states and internalize the cross-border implications of bank-risk taking, the EU agreed to a historic banking union or single supervisory mechanism (SSM) across member states in 2014.¹ Using granular bond-level data, this new regulatory environment provides an attractive empirical setting to evaluate important theories about how solvency shocks influence banks’ risk-taking.² In addition, we study the consequences of these portfolio adjustments at banks on asset prices, including those of domestic government debt. Banking systems account for a large volume of bond holdings in the EU, and this empirical setting can help reveal how the solvency of financial intermediaries might influence liquidity and pricing in bond markets.

We begin with the well-known argument that rather than rebalance their portfolio towards “safer” assets in order to avoid failure – the flight to safety hypothesis (Holmström

¹ The closest precedent is the Federal Reserve Act of 1913 after the 1907 panic, which also made the Fed a joint regulator of member banks across the United States (Meltzer, 2003).

² Much of the research on banking unions has taken place in the context of the United States – see for example Agarwal et al. (2014) and Eisenbach, Lucca, and Townsend (2019).

and Tirole, 1997; Thakor, 1996) – lightly supervised distressed banks might gamble or shift into riskier assets in search of higher yield – the risk shifting hypothesis. In one form of this hypothesis, distressed banks increase their exposure to assets whose returns are highly positively correlated with the survival of the bank, such as domestic assets. Also, regulatory arbitrage can combine with the risk-shifting hypothesis and induce distressed banks to increase their holdings of higher yielding sovereign debt in order to “search for yield” – sovereign debt is regulated more favorably than other assets. Together, these actions fragment or “re-nationalize” a currency union and render banking systems less diversified, more susceptible to common shocks, and riskier than their regulatory solvency ratios suggest.³

A major challenge in empirically distinguishing between these contrasting theoretical predictions and understanding the effectiveness of supra-national financial regulation in curtailing bank-risk taking is that unobserved economic conditions that cause regulatory solvency shocks also affect the distribution of asset returns. Thus, any portfolio rebalancing after a solvency shock could reflect bankers’ changing beliefs about expected asset returns induced by economic unobservables rather than a causal response to the solvency shock itself. Endogenous matching between country-banking systems and security types can also lead to biased estimates. Because of superior information for example, some banking systems might specialize in trading certain securities. But this specialization on account of latent information could also determine both the pattern of solvency shocks the banking system experiences as well as its asset choices, leading again to biased inference. Also, economic theory observes that information differences can pose even more fundamental inference challenges. Because domestic banks might be relatively better informed about domestic assets, domestic banks might earn higher risk-adjusted returns on these assets. And any increase in “home-bias” after an adverse shock could reflect a “flight to safety”

³ There is a large theoretical literature on bank behavior in times of distress – see the discussions in Gorton and Winton (2003), Freixas, Rochet, and Parigi (2004), and Boyd and Hakenes (2014); Admati et al. (2018) discuss these issues more generally in the corporate finance literature. Discussions that center on regulatory approaches aimed at addressing these bank responses include Dewatripont and Tirole (2012), Hanson, Kashyap, and Stein (2011) and Kashyap, Rajan, and Stein (2008).

rather than risk-shifting (Van Nieuwerburgh and Veldkamp, 2009).

The security-level data on banks' bond holdings can help address these identification concerns. With this level of granularity, the baseline specifications can non-parametrically absorb time-varying shocks to a bond's returns. This implies that for two banking systems that hold the same bond, we can study how regulatory solvency shocks to one of these systems shapes its holdings of the bond at the intensive margin relative to the other banking system (Khwaja and Mian, 2008). We can also use non-parametric controls to address endogenous matching concerns. The security-level data itself begins in 2014 Q1 and extends through end-2017, containing considerable variation in solvency shocks as well as changes in financial regulation, including new capital and liquidity regulations.

We find that even within the new Single Supervisory Mechanism (SSM), which is designed to address cross-border spill-overs, risk-shifting appears to be the most attractive interpretation of bank behavior after adverse solvency shocks. Using the granular bond data, regressions at the security-level show that after a regulatory solvency shock, banking systems reduce their exposure to high yielding foreign private sector debt. Instead, banks "re-nationalize" their portfolio by increasing their exposure to domestic private sector debt. These domestic bonds co-vary positively with the banking system's survival, and thus help banking systems' maximize their expected returns, conditional on survival. Moreover, consistent with the risk-shifting hypothesis, for the same sized shock, the move into domestic debt is stronger among banking systems that are already closer to insolvency.

In particular, for the full sample, a one percentage point decline in regulatory solvency suggests a 0.16 percentage point increase in the banking system's holdings of domestic low-yielding private sector bonds, along with a 0.04 percentage point drop in its holdings of foreign high-yielding private sector bonds.⁴ Among banking systems that have below median regulatory solvency, the same one percentage point negative solvency shock suggests a 0.20 percentage point increase in the net position in domestic low-yielding private sector debt; but for the more solvent banking systems, this adjustment margin is statistically

⁴ Tier 1 equity allows a bank to absorb losses on an ongoing basis, see <https://www.bis.org/press/p981027.htm>.

insignificant. We also find that even within the banking union, risk shifting interacts with regulatory arbitrage. While all EU government debt are regulated identically, a negative solvency shock leads banks to primarily increase their exposure to their own domestic sovereign. But within this category, banks move towards higher yielding more illiquid sovereign debt. A one percentage point decline in the regulatory solvency ratio suggests a 0.40 percentage point increase in a banking system's holdings of higher yielding – longer duration – domestic government debt.

Moreover, using unique data about the relative importance of variable versus fixed wage compensation contracts for the senior management of EU banking systems, we find additional empirical support for the risk shifting hypothesis. Many theories predict that senior bankers with high-powered contracts that allow for a large bonus or variable pay component can earn significant payouts when bank survival and asset performance are positively correlated (Bolton, Scheinkman, and Xiong, 2006), (Bolton, Hamid, and Shapiro, 2011). We find that after a negative solvency shock, banking systems that rely more on variable pay schemes to compensate senior management also disproportionately increase their holdings of domestic government debt, especially high-yielding domestic government debt.

Competing explanations such as informational advantages are unlikely to account for these results. Among industrialized economies, the valuation of sovereign debt does not usually require specialized inside knowledge, and domestic banks do not have a relative valuation advantage for this asset class, especially after an adverse solvency shock. Also, other tests using private sector bonds weigh against the information hypothesis. After a negative solvency shock, banks seek out not the thinly traded domestic bonds, for which domestic banks might actually have an information advantage, but the liquid large capitalization bonds. These latter bonds are relatively information rich, require much less valuation expertise, and importantly for the risk shifting hypothesis, positively co-vary with the survival of the domestic banking system. Equally telling, banking systems actually increase their exposure to domestic bank bonds after an adverse solvency shock to the domestic banking system. Clearly, the performance of domestic bank debt is highly

correlated with the performance of the domestic banking system. And this result is consistent with the idea that distressed banks herd, collectively buying each other’s debt, in order to increase the risk of failing together and precipitating a collective bailout (Acharya and Yorulmazer, 2007). Indeed, the EU banking union’s regulations allow for more lenient government bailouts when banks are collectively distressed than when a single bank is distressed.⁵

While the granular data can help address omitted variable bias, a key objection to these results is that shocks to regulatory solvency might proxy for other shocks that ultimately explain these adjustment margins. To address this concern, we exploit a key feature of European bank regulation during the sample period. The leverage ratio, the ratio of bank equity to total assets, is also positively correlated with the fundamental health of the bank, but was not introduced into European banking regulation until the very end of our sample – January 2018.⁶ Thus, if shocks to regulatory solvency proxy for other unobserved shocks that ultimately explain the pattern of adjustment, then replacing the change in the risk-based regulatory solvency ratio with the change in the leverage ratio should yield approximately similar results. We find, however, that negative shocks to the leverage ratio do not explain banking systems’ portfolio adjustments.⁷

The evidence suggests that regulatory solvency shocks can induce banks to shift into riskier assets that are also regulated favorable, such as longer duration domestic sovereign debt, and away from foreign assets that actually offer diversification benefits. This potentially makes the banking system riskier than its regulatory solvency ratios might suggest, and these risks can in turn be “transferred” onto the bank’s assets. That is, beginning with Grossman and Miller (1988) prominent theories observe that the solvency of financial intermediaries can influence liquidity and pricing in the markets in which they operate. In one key channel, because undercapitalized financial institutions might be forced to liqui-

⁵ See <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02014L0059-20200107>.

⁶ See https://www.bis.org/publ/bcbs189_dec2010.htm.

⁷ Arguably, the leverage ratio may even be a better measure of the fundamental health of the bank than the risk-based regulatory solvency ratio, because banks have an incentive to artificially increase the latter by manipulating the risk weights of their assets (Mariathasan and Merrouche, 2014).

date assets at a discount in the future, this liquidation “overhang” can depress the current prices of assets owned by troubled institutions. In our setting, these theories predict that bonds predominantly owned by less-well capitalized financial intermediaries should trade at a discount relative to otherwise similar bonds owned by intermediaries further away from regulatory insolvency. However, theories that emphasize the importance of financial repression predict that the domestic banking system’s buying of domestic government debt reduce yields (Uhlig, 2014).

Using detailed bond controls that help address concerns about endogenous matching and unobserved time-varying shocks, we find that a bond’s yield increases when the bond’s weighted exposure to less-well capitalized banking systems increases. A one percentage point decline in the weighted average solvency of the banks that own a bond is associated with a 0.19 percentage point increase in a bond’s yield. We also use the detailed data on the nationality and sector of both the bond and its owner to address remaining endogeneity concerns, and examine the mechanisms through which solvency shocks affect bond prices.

The logic of these tests builds on the fact that regulations largely leave domestic governments responsible for bailing out their banking system. Therefore, adverse shocks to the regulatory solvency of the banking system increase both the liquidation risk of domestic government bonds (and other bonds) held by this banking system as well as the contingent liabilities of the domestic government (Acharya, Drechsler, and Schnabl, 2014). Both these forces in turn would depress domestic government bond prices. In contrast, since foreign governments within the EU do not directly insure other countries’ banking systems, foreign government bonds are only subject to liquidation risk after adverse solvency shocks to the banking system.⁸ In keeping with this logic, we find that adverse solvency shocks to a banking system increase the yields of domestic as well as foreign government bonds. But the impact of solvency shocks on domestic government bond yields is nearly twice as large as the impact on foreign government bond yields.

⁸ To be sure, European regulations now allow for a single resolution mechanism (SRM), which centralizes bank bailout policies (https://ec.europa.eu/info/business-economy-euro/banking-and-finance/banking-union/single-resolution-mechanism_en). However, it remains unclear whether the SRM limits an individual sovereign from bailing out its own financial system.

Taken together, these results are supportive of theories that emphasize the risk-shifting incentive in explaining bank behavior after adverse solvency shocks. This evidence also shows that risk-shifting not only impacts the riskiness of the banking system, but can spill over onto the prices of the assets into which distressed banks shift. Moreover, while we do not construct counterfactual scenarios to assess the overall effectiveness of Europe’s banking union, this evidence suggests that at least in its current form, the banking union does not seem to have completely addressed bank risk-taking incentives and the resulting re-nationalization of credit flows within the EU after adverse solvency shocks.

This paper proceeds as follows. Section 2 places this paper in the context of the related literature; Section 3 describes the empirical framework and data, while Section 4 presents the main results; Section 5 concludes.

2 Related Literature

The EU banking and subsequent sovereign debt crises that began in 2008 has generated a rapidly growing theoretical and empirical literature. A major theme in the theoretical literature is that the health of the sovereign and of the domestic financial system are closely interrelated, and that this interrelationship can amplify adverse shocks. Because domestic sovereign debt is an important source of liquid assets for domestic banking systems, declining sovereign credit worthiness impairs the functioning of the domestic banking system. This increase in bank distress can then curtail the supply of credit – a credit crunch – and also increase expectations of a bank bailout. The resulting credit crunch and the increased expectations of government expenditures, including on bank bailouts, increase the expected issuances of sovereign debt and the risk premium on that debt, putting further pressure on sovereign yields and creating a “doom” or “diabolical loop” that feeds back onto the banking system (Brunnermeier et al., 2016; Acharya, Drechsler, and Schnabl, 2014; Farhi and Tirole, 2018).

Some of these arguments also predict that this feedback or doom loop can create perverse incentives on the part of domestic banks. In a version of the risk-shifting argument,

because deposit insurance removes creditor discipline and limited liability limits bank shareholder losses, distressed banks have powerful incentives to increase their exposure to assets that payoff when the banks survive (Diamond and Rajan, 2011; Jensen and Meckling, 1976). Domestic assets, and in particular domestic government bonds, evince the highest positive correlation with the domestic banking’s system’s survival, and the risk-shifting argument predicts that banking systems will increase their exposure to these assets after adverse solvency shocks (Crosignani, 2017). A related argument observes that capital regulation creates incentives for regulatory arbitrage in which domestic government bonds, which have a zero risk weight when calculating regulatory solvency ratios, become an even more attractive asset into which undercapitalized banks can risk-shift: domestic government bonds both payoff in the state of the world in which domestic banks survive, and these bonds also incur no regulatory capital charge.

Thus, a worsening of domestic sovereign credit worthiness that leads to losses at domestic banks might induce these banks to perversely purchase even more domestic sovereign debt. Banks might also seek out longer duration domestic sovereign debt to reach for yield and generate additional income. The increased “home bias” associated with this version of risk-shifting makes the banking system less diversified and disrupts cross-border lending relationships across. Increased “reach for yield” behavior also makes the banking system more exposed to interest rate risk. In contrast, the “flight-to-safety” hypothesis predicts that banks that experience negative solvency shocks might both deleverage through asset sales and rebalance their asset holdings towards “safe” assets, like German and US government debt, in order to avoid failure (Holmström and Tirole, 1997; Thakor, 1996).

The empirical literature has made some progress in measuring the importance of the risk-shifting motive in fostering these feedback loops, but there remains much uncertainty over the interpretation of these results.⁹ Using data from the 2008-2015 period – before the EU moved to centralized bank regulation and supervision – several studies suggest that

⁹ There is a voluminous empirical literature from past crises on the effects of banking sector solvency shocks. See Kane (1989) on the U.S. savings and loans crisis. Peek and Rosengren (2000) and Hoshi, Kashyap, and Scharfstein (1990) are two classic references on the Japanese banking crises of the 1990s.

poorly capitalized banks tend to increase their purchases of domestic sovereign debt. This evidence is interpreted as either moral suasion – government pressure on banks to buy domestic sovereign debt – or risk-shifting. For example, Altavilla, Pagano, and Simonelli (2017) use monthly bank level data showing that banks increase their purchases of domestic public debt, especially when liquidity injections by the European Central Bank (ECB) reduce funding costs, which is consistent with moral suasion. Earlier in the crisis, Acharya and Steffen (2015) interpret the positive factor loadings of bank stock returns on periphery bond returns as evidence of risk-shifting. While using higher frequency data, Ongena, Popov, and Van Horen (2019) document that domestic banks with weaker balance sheets or those that received government support were more likely to help domestic governments roll-over public debt – a result that is consistent with moral suasion.

Unobserved demand, as well as other factors that affect the future distribution of asset returns present key challenges to interpreting the evidence. Notably, in periods of crisis, the demand for external finance from the non-financial sector might be limited, leaving public debt as the main asset in which domestic banks can invest. Thus, any association between solvency shocks at banks and their increased holdings of domestic sovereign debt could reflect a lack of demand for credit in the non-financial sector. Public debt might also offer higher risk adjusted returns, especially to domestic creditors, as governments are often unwilling to default on domestic creditors (Broner et al., 2014; Gennaioli, Martin, and Rossi, 2014).

Differences in information between domestic and foreign banks also make it difficult to tell apart the flight-to-safety and risk-shifting hypotheses. Some models predict that because domestic banks are better informed about domestic assets than their foreign competitors, domestic banks earn higher risk-adjusted returns on these assets (Van Nieuwerburgh and Veldkamp, 2009). Thus, rather than reflecting risk-shifting, an increase in “home-bias” in the portfolio of domestic banks after an adverse shock could reflect a flight-to safety, as domestic banks exploit their comparative information advantage in domestic assets to create safer portfolios. Some of the recent studies using more granular data reflect this nuance. Data from Italy at the security-level, which can help non-parametrically con-

trol for some of these latent factors, present more nuanced results, showing that less-well capitalized banks appear to shift into less risky assets (Peydro, Polo, and Sette, 2017). Security-level evidence in Timmer (2018) also suggests more complex bank responses, as less well capitalized German banks decrease their exposure to poorly performing assets.

Notwithstanding the difficulties in interpreting the evidence, the belief that bank risk-shifting, done with the tacit approval of domestic supervisory authorities and governments, might help drive a doom loop led to the creation of the European banking union in 2014. In January 2014, the EU largely harmonized all banking regulations across EU member states, so that all supervisors operate with the same regulatory rule book. Moreover, from November 2014 onwards, banking supervision was centralized within the ECB. All the banking systems in our sample therefore operate with a consistent set of regulations, and unlike even the United States, the banks are for most of our sample supervised by the same institution – the ECB. The ECB also operates as a lender of last resort, though bailout decisions are jointly determined by the European Single Resolution Board (SRB) and the sovereign of each of the banking systems.

This institutional setting of a single supervisory mechanism provides a helpful environment to identify theories of how banks respond to solvency shocks. Theories of moral suasion and related forms of financial repression, observationally identical to risk-shifting, depend on the coordination between supervisory authorities and governments, so that distressed banking systems can act in the government’s interests while benefiting from supervisory forbearance.¹⁰ But the regulatory and supervisory harmonization created by the SSM renders this type of coordination between supervisory authorities and governments much more difficult compared to pre-2014 – the period covered by most studies.¹¹ Using security level data also allows us to construct empirical tests that are robust to unobserved demand shocks, and other time-varying factors that can affect the interpretation of the evidence.

¹⁰ In the case of the U.S., Agarwal et al. (2014) show that political economy considerations can induce subnational supervisors (i.e., states) to inconsistently apply bank regulations relative to federal authorities.

¹¹ See <https://eba.europa.eu/regulation-and-policy/single-rulebook> for more information on this regulatory harmonization.

Equally important, we also extend the existing literature by focusing on the impact of these solvency shocks on the pricing of bonds – an issue that has received much less attention in the empirical literature but is of significant importance. Arguably the banking sector’s purchases of domestic sovereign and other debt can help reduce yields (Uhlig, 2014). But an influential literature also observes that because of the risk of future fire-sales, bonds predominantly owned by less-well capitalized intermediaries can trade at a discount relative to otherwise similar bonds owned by intermediaries further away from regulatory insolvency (Grossman and Miller, 1988; Allen and Gale, 2005). This feedback from intermediary solvency onto asset prices in the economy is also an important feature of recent macro models (He and Krishnamurthy, 2013; Brunnermeier and Sannikov, 2014). And our security-level data, which affords a number of non-parametric controls, can help identify this feedback mechanism. In sum, our empirical setting provides the first opportunity to evaluate the risk-shifting hypothesis and its impact on bond pricing within the newly created European banking union. The next section describes the empirical framework and data in greater detail.

3 Empirical Framework and Data

3.1 Empirical Framework

To investigate how banking systems respond to solvency shocks at the intensive margin, we estimate the following baseline equation:

$$\begin{aligned}
\Delta Holdings_{ijt} &= \alpha_{it} + \beta_{ij} + \beta_G I_G \Delta Tier1_{jt} + \beta_D I_D \Delta Tier1_{jt} + \beta_H I_H \Delta Tier1_{jt} \\
&+ \beta_{GD} I_G I_D \Delta Tier1_{jt} + \beta_{GH} I_G I_H \Delta Tier1_{jt} + \beta_{DH} I_D I_H \Delta Tier1_{jt} \\
&+ \beta_{GDH} I_G I_D I_H \Delta Tier1_{jt} + \Delta Tier1_{jt} + e_{ijt}.
\end{aligned} \tag{1}$$

The dependent variable, $\Delta Holdings_{ijt}$, is the quarter-on-quarter percentage point change in banking system’s j holdings of security i at time t , where we measure holdings as a per-

centage of the total outstanding amount of security i . The dependent variable therefore measures changes in the quantity of securities held at the intensive margin rather than changes in their market price. The variable $\Delta Tier1_{jt}$ is the quarter-on-quarter percentage point change in the Tier 1 capital to risk-weighted assets ratio of the banking system j at time t . During the sample period, European supervisors did not use the leverage ratio – the ratio of Tier 1 capital to total assets – and $\Delta Tier1_{jt}$ is the standard regulatory measure of changes in solvency based on the risk weighting of a bank’s assets. Since banks engage in capital planning and can anticipate their regulatory solvency ratios in the short term, this ratio enters contemporaneously in the baseline specification. Note that our results are unchanged if we use the residual after modeling regulatory capital as an AR(1) process.

Equation (1) uses a series of indicator variables and interaction terms to discriminate among the principal and sometimes overlapping theories on how banks might adjust their asset holdings in response to adverse solvency shocks. The simplest versions of the risk-shifting hypothesis predict that banks might rebalance towards riskier, higher yielding assets when their regulatory solvency declines. We thus use an indicator variable, I_H , that equals 1 if a security’s yield is above the median in that quarter-security type and 0 otherwise.

For example, for a domestic government bond this indicator variable would equal one if its yield in the current quarter exceeds the median yield on domestic government bonds in the same quarter. The coefficient β_H thus measures how a banking system adjusts its holdings of “higher risk” bonds after a change in solvency. If β_H is negative, it would suggest that a decline in regulatory solvency is associated with a relative increase in a banking system’s holdings of higher yield bonds.

Capital regulations constrain a bank management’s risk-taking choices. But within these regulatory constraints, management can substitute to riskier higher yielding assets after an adverse shock (i.e., regulatory arbitrage). Banks seeking to economize on capital might for example shift into government bonds. Under EU banking regulation, government bonds of member states carry a zero risk weight, so that the capital requirement for them is zero irrespective of their riskiness. We therefore use an indicator variable I_G that equals 1

if a security is a government bond and 0 otherwise to capture this adjustment dimension. If β_G is negative then, all else constant, it would suggest that a decline in regulatory solvency is associated with a relative increase in a banking system's holdings of government bonds. But within the category of government debt, banks might risk-shift by moving into longer duration or riskier bonds in search of higher yield. We thus include an interaction term, $I_G I_H$, to measure this response. It equals 1 when the bond is both government and high yielding, and 0 otherwise; in turn the coefficient, β_{GH} , measures the impact of a solvency shock on this adjustment margin.

Also, a key prediction from the risk-shifting literature is that distressed banks might increase their exposure to assets whose returns co-vary positively with the bank's own survival. Intuitively, in the state of the world where the bank survives, bank shareholders also benefit from the asset's higher returns. But in the state of the world where the bank fails, limited liability caps losses if the asset returns are also poor, making assets with a positive return covariance particularly attractive vehicles to shift risk. To measure this adjustment dimension, we build on the idea that relative to foreign bonds, the covariance between domestic bond returns and the domestic banking system's probability of survival is much more highly correlated. We thus classify security holdings based on whether the issuer and the holding banking system are from the same country, I_D , and the coefficient, β_D , measures the relative rebalancing towards domestic bonds in the portfolio after a solvency shock.

As before, we also include a number of interaction terms to measure how a banking system might risk-shift within the category of domestic bonds. Notably, domestic higher yielding government debt is an attractive risk-shifting asset after an adverse solvency shock. EU government debt carries zero risk weight; domestic government debt evinces the highest covariance with the domestic banking system's survival probability; while the additional yield helps the bank earn higher profits if the government survives. The triple interaction term $I_G I_D I_H$ models this adjustment margin.

Throughout, we include all the subcomponents of the various interactions; the linear components of the interaction terms are absorbed in the bond-by-year-quarter and bond-

by-banking system fixed effects. The subcomponents of the interaction terms themselves also model important adjustment dimensions. Notably, the banking system could risk-shift into domestic non-government debt after an adverse solvency shock. But capital regulation can constrain management's ability to increase the bank's holdings of higher yielding domestic assets, as these tend to also have higher risk-weights. The term $I_D I_H$ thus measures the extent to which banks purchase additional domestic higher yielding assets after adverse shocks.

The granularity of the data and the use of time-varying fixed effects are important for the identification strategy. Latent economic shocks can affect both the solvency of a country's banking system and the expected future payoff of specific securities, biasing estimates of β_G , β_D and β_H . An unobserved adverse economic shock could for example deplete Tier 1 equity and at the same time reduce the attractiveness of private sector bonds, causing banks to rotate into sovereign bonds. Such a portfolio readjustment would be observationally identical to various forms of the risk-shifting hypothesis, and most existing studies based on balance sheet aggregates would have difficulty distinguishing between this risk-shifting motive versus latent shocks.

Because we use security-level data, including security by year-quarter-fixed effects in the baseline specifications enables us to non-parametrically absorb any time varying shocks that might simultaneously determine both the attractiveness of a security and bank solvency shocks. Intuitively, this within security exercise estimates how two separate banking systems adjust their holdings of the same security in the same quarter in response to the variation in the banking systems' solvency ratios. A related concern centers on endogenous matching between country-banking systems and securities. Some banking systems might for example specialize in certain securities, either because of superior information or historical accident. But these latent factors could also determine the pattern of solvency shocks to the banking system, leading again to biased inference. We thus include country-banking system by security fixed effects to absorb the time invariant factors that might lead certain banking systems to prefer specific securities. We next describe the data in greater detail.

3.2 Data

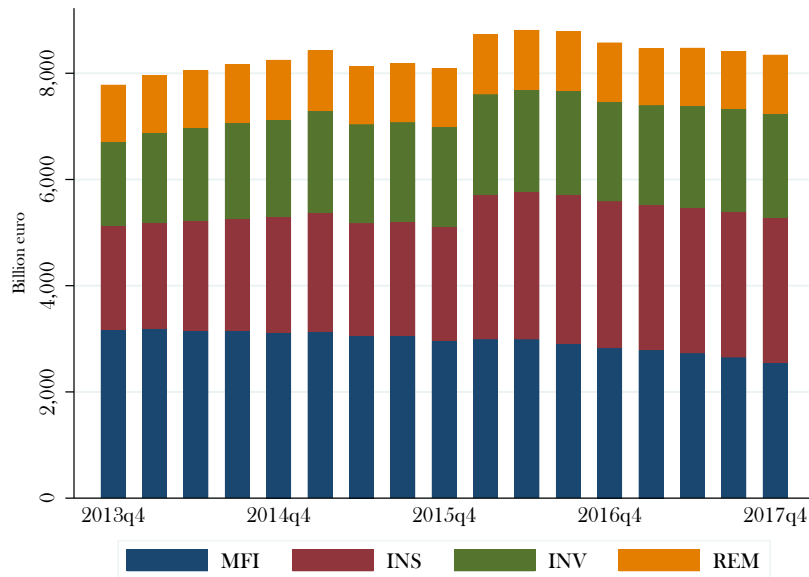
We use the Sector module of the Securities Holdings Statistics (SHS). This confidential dataset from the European System of Central Banks (ESCB) contains detailed information on the holdings of long-term – maturity in excess of one year – debt securities by euro area residents, reported on a quarterly basis.¹² Each observation in the dataset corresponds to an ownership position in a bond identified by the bond’s unique International Securities Identification Number (ISIN). Owners are reported on a country-sector level of aggregation. With this data, we can for example identify the Spanish banking system’s ownership of a bond in a given quarter that is issued by the German government. Similarly, for the same German government bond, we can also observe the share that is owned by households in Belgium.

Our sample begins in 2013 Q4, when the ECB started to collect the data, and ends in 2017 Q4. Figure 1 plots the total value of bond holdings in the dataset over the sample period. The panels in Figure 2 show the composition of ownership and issuances across 9 broad sectors and 18 EU countries that are covered by the dataset. From panel A, German and French nationals account for about 15 percent each of the long-term bond holdings in the EU, with Italian nationals, the third largest group, owning about 5 percent of bonds in the EU. Panel B shows that outstanding issuances are somewhat more smoothly distributed, with German, French and Italian nationals accounting for about 18 percent each of all outstanding bond issuances. Spanish and Dutch nationals round out the top 5, with issuances around 10 percent of the total volume.

Panel C shows that for most of the sample period, banks (abbreviated as MFI’s, i.e., monetary and financial institutions) are the major holders of bonds in the EU, and on average they hold about 18 percent of the market capitalization of bonds in the dataset. The figure also shows that this aggregate ownership share remains relatively constant, fluctuating between 15 and 19 percent. Investment funds and insurance companies are

¹² The SHS dataset that we use does not include holdings by the ESCB itself (i.e., from central bank asset purchase programs). A detailed description of the dataset can be found on the website of the ECB: https://www.ecb.europa.eu/stats/financial/_markets/_and/_interest/_rates/_securities/_holdings/html/index.en.html.

Figure 1: Value of bond holdings by sector over time

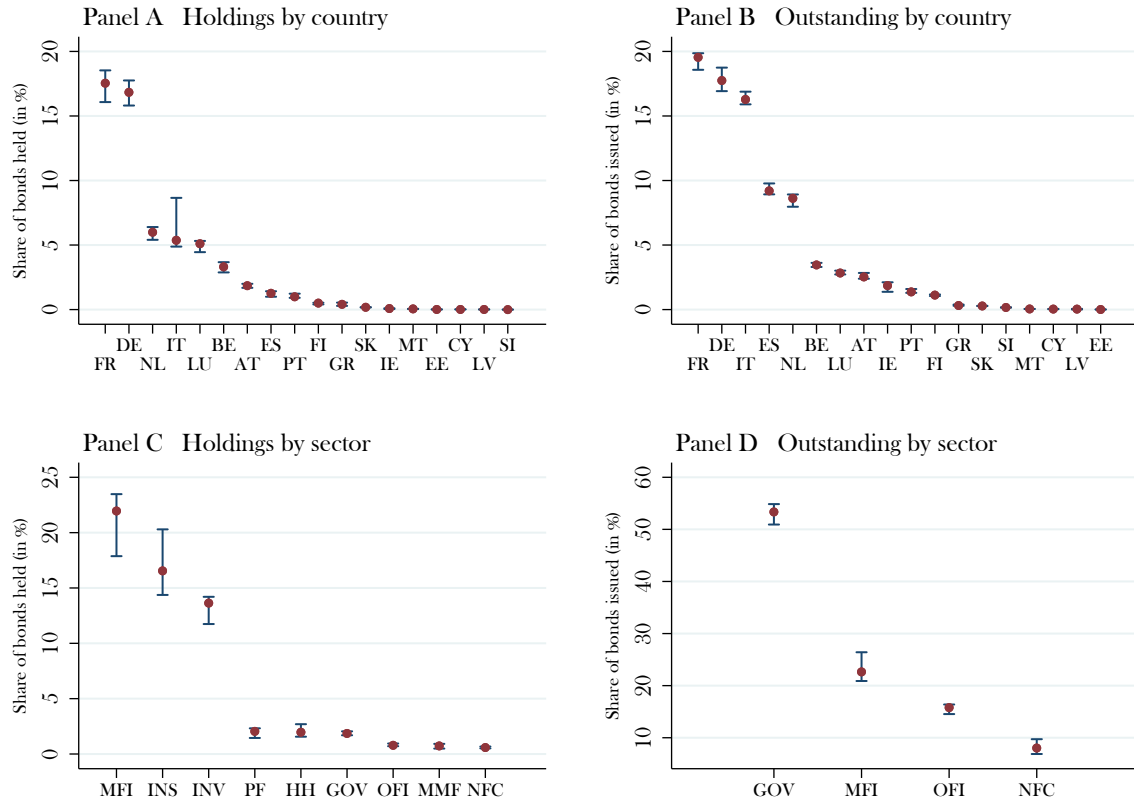


Note: the bars indicate the market value all euro denominated bonds held by monetary and financial institutions (MFI), insurance companies (INS), investment firms (INV), and remaining sectors (REM).

the other main holders of bonds in the EU (14 and 13 percent on average, respectively). Panel D shows that government bonds dominate the market capitalization of all bonds in the dataset, followed at considerable distance by bonds issued by banking systems.

Finally, we combine the securities data with data from the ECB’s Statistical Data Warehouse (SDW) on the balance sheets of national banking systems. Up until the end of our sample in 2017 Q4, European regulatory authorities relied on the ratio of Tier 1 equity to risk-weighted assets to assess bank solvency. Starting in 2018 Q1, European regulators supplemented this risk-weighted ratio with the leverage ratio – the ratio of Tier 1 equity to total assets. We obtain both ratios for all national banking systems in our sample, focusing on domestic bank groups and excluding foreign controlled subsidiaries and branches. Figure 3 shows that Tier 1 equity ratios differ considerably across banking systems. They are highest for Luxembourg, equaling about 27 percent on average. Moreover, Tier 1 equity ratios are higher than leverage ratios, which reflects that risk-weighted assets are generally lower than total assets, because risk weights are typically less than one hundred percent.

Figure 2: Share of bond holdings and outstanding by country and by sector

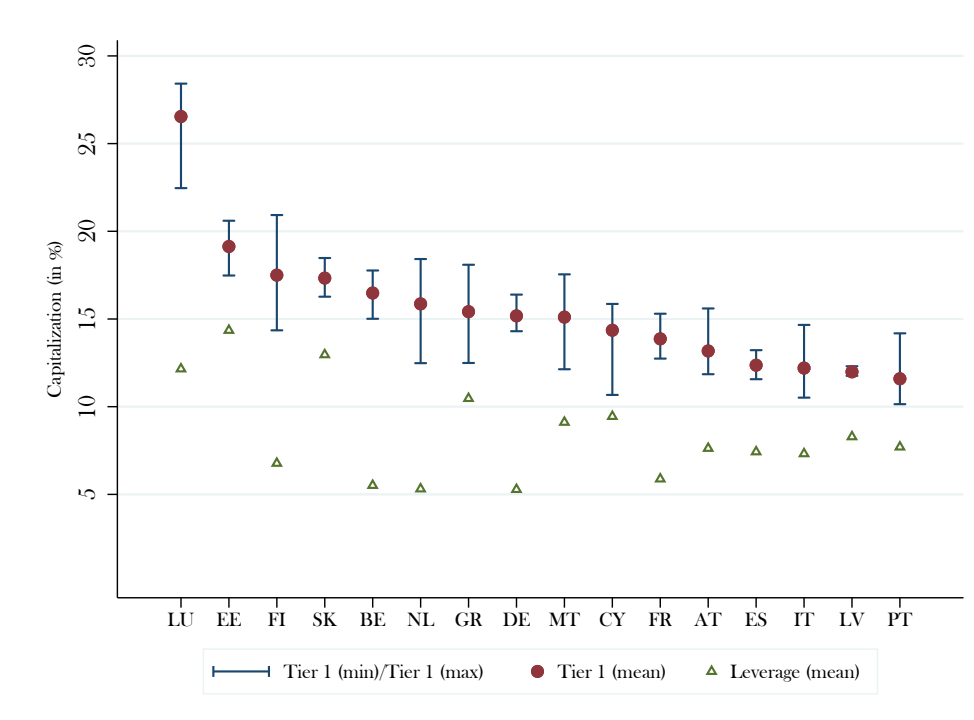


Note: the dots indicates the mean values and the endpoints of the whiskers represent the minimum and maximum values. Countries are: Austria (AT), Belgium (BE), Cyprus (CY), Germany (DE), Estonia (EE), Spain (ES), Finland (FI), France (FR), Greece (GR), Ireland (IE), Italy (IT), Luxembourg (LU), Latvia (LV), Malta (MT), Netherlands (NL), Portugal (PT), Slovenia (SI), and Slovakia (SK). Sectors are: monetary and financial institutions (MFI), insurance companies (INS), investment firms (INV), pension funds (PF), governments (GOV), households (HH), other financial institutions (OFI), money market funds (MMF) and non-financial corporations (NFC). The ratio's in Panel C will be lower than what one would expect from Figure 1 because of non-euro area holders.

4 Main Results

The first three columns of Table 1 illustrate the low power that tests using aggregate data have in distinguishing between various theories of how banks respond to distress. These columns aggregate the security-level data and show the simple bivariate correlations between the three principal dimensions through which banks might adjust their portfolios in

Figure 3: Banking system capitalization by country



Note: the dots indicate the mean values by national banking system of Tier 1 equity as a percentage of risk weighted assets (i.e., the Tier 1 ratio), with the minimum and maximum values as the endpoints. The triangles indicate the mean values of Tier 1 equity as a percentage of assets (i.e., the Leverage ratio). Countries are: Austria (AT), Belgium (BE), Cyprus (CY), Germany (DE), Estonia (EE), Spain (ES), Finland (FI), France (FR), Greece (GR), Ireland (IE), Italy (IT), Luxembourg (LU), Latvia (LV), Malta (MT), Netherlands (NL), Portugal (PT), Slovenia (SI), and Slovakia (SK).

response to a change in Tier 1 ratios for a panel of country-banking systems. The dependent variable in Column 1 is the change in the share of domestic securities in a country-banking system's bond portfolio in a given quarter. Controlling for country fixed effects, the coefficient for the change in the Tier 1 ratio is statistically insignificant. Column 2 uses the change in the share of government bonds in the portfolio as the dependent variable, while Column 3 uses the change in the share of high yielding bonds. In all three columns, there is no evidence that changes in regulatory solvency are associated with portfolio rebalancing either towards government, domestic or higher yielding bonds.

Columns 4–6 of Table 1 use the disaggregated security-level data to estimate a parsimonious version of Equation (1), along with security by year-quarter fixed effects and

Table 1: From aggregate to bond-level data

Variables	(1) Domestic Holdings (Δ share)	(2) Government Holdings (Δ share)	(3) High Yield Holdings (Δ share)	(4) Δ Holdings	(5) Δ Holdings	(6) Δ Holdings
Δ Tier 1	-0.4749 (0.7391)	-0.6501 (0.5140)	-0.2208 (1.1393)	0.0009 (0.0065)	0.0042 (0.0057)	-0.0103 (0.0067)
Government# Δ Tier 1				-0.0291** (0.0148)		
Domestic# Δ Tier 1					-0.1295*** (0.0358)	
High yield# Δ Tier 1						0.0263* (0.0141)
Observations	237	237	237	324,069	324,069	291,420
R-squared	0.0048	0.0056	0.0002	0.4251	0.4251	0.4256
Banking system FE	Yes	Yes	Yes			
Bond x Time-period FE				Yes	Yes	Yes
Bond x Banking system FE				Yes	Yes	Yes

Note: *** $p < 0.01$, ** $p < 0.05$, * $p < 0.1$. The dependent variable in Column 1 is the quarter-on-quarter change in domestic bond holdings as a percentage of a banking system's total bond holdings. Column 2 uses the change in the share of government bond holdings as the dependent variable, and Column 3 uses the change in the share of high-yield bond holdings. The dependent variable in Columns 4 to 6 is the quarter-on-quarter change in a banking system's holdings of an individual bond i as a percentage of the total amount outstanding of this bond. Standard errors in Columns 4-6 are clustered at the bond level. Statistical significance is largely unaffected when clustering at the banking system level or double clustering at the banking system-quarter level.

security by country-banking system fixed effects. From these columns there is significant evidence that banks adjust their bond portfolio in response to regulatory solvency shocks. The dependent variable in Columns 4–6 is the quarter-on-quarter change in a banking system's position in a specific bond. From Column 4, a one percentage point decline in a banking system's Tier 1 ratio is associated with a 0.03 percentage point increase in the banking system's holdings of government bonds.

Note that because Column 4 uses security by year-quarter fixed effects, it absorbs time-varying shocks to each individual security, thereby estimating the likely causal effect of the regulatory solvency shock on the banking system's portfolio adjustment. Put differently, for two otherwise separate banking systems that hold the same government bond, Column 4 suggests that the banking system that suffers a decline in its regulatory solvency ratio

increases its holdings of the government bond relative to the unaffected banking system.

Column 5 suggests that adjustment to solvency shocks also occurs along the “domestic” dimension. In this case, a one percentage point decrease in the Tier 1 ratio is associated with a 0.13 percentage point increase in the banking system’s holdings of domestically issued bonds. This result is consistent with the risk-shifting hypothesis, whereby domestic banking systems purchase domestic assets because of the high correlation between domestic assets and their own performance.¹³

In keeping with the idea that regulation and centralized supervision might limit the simplest manifestations of the risk-shifting incentive, Column 6 shows that a one percentage point drop in the Tier 1 ratio is associated with a 0.03 percentage point decline in a banking system’s holdings of “high yielding” bonds. This suggests that the enforcement of risk-weighted solvency regulation by supervisory authorities might limit the scope for the simplest forms of risk-shifting, barring banks from increasing their exposure to the riskiest asset classes after adverse solvency shocks. Note that there are no regulations that limit the a bank’s exposure to government debt (from OECD countries), or to domestic assets.¹⁴

To tell apart better the different hypotheses, Table 2 jointly includes the interaction terms for the different types of bond characteristics. From Column 1, the individual terms remain statistically significant, and their point estimates are somewhat more pronounced than in Table 1. For example, a one percentage point drop in the Tier 1 ratio is associated with about a 0.04 percentage point average decline in a banking system’s position in “high yielding” bonds.

Column 2 focuses in greater detail on the overlapping dimensions through which adjustment of banks to distress might occur. As described in Equation (1), this more granular specification allows the adjustment margin to additionally depend on whether the bond is

¹³ Three factors weigh against the moral suasion interpretation for these results. First, the shift to centralized supervision and regulation within the ECB limits the influence of national governments and banking supervisors on their banks. Second, these intensive margins changes in bond holdings are unlikely to be large enough to matter for domestic firms. Third, rolling over maturing bank loans that otherwise could be difficult to refinance would seem a likelier conduit for moral suasion than buying bonds in secondary markets.

¹⁴ International standards for the regulation of concentration or large exposure risks can be found at <https://www.bis.org/press/p140415.htm>

Table 2: Changes in solvency and bond holdings

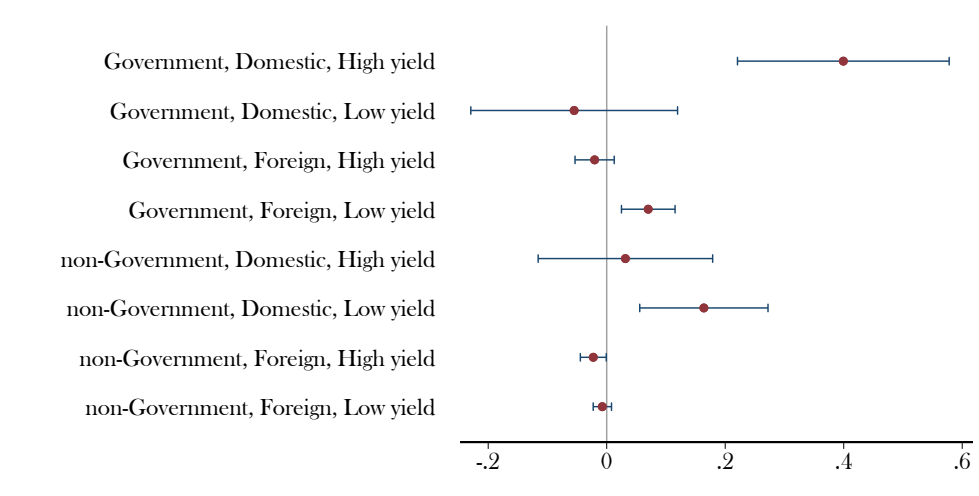
Variables	Tier 1 / Risk Weighted Assets		Tier 1 / Assets
	Δ Holdings (1)	Δ Holdings (2)	Δ Holdings (3)
Δ Capitalisation	0.0042 (0.0070)	0.0074 (0.0079)	0.0053 (0.0139)
Government# Δ Capitalisation	-0.0336** (0.0155)	-0.0775*** (0.0244)	-0.0089 (0.0461)
Domestic# Δ Capitalisation	-0.1374*** (0.0374)	-0.1714*** (0.0559)	-0.0743 (0.0780)
High yield# Δ Capitalisation	0.0373*** (0.0143)	0.0153 (0.0136)	0.0285 (0.0299)
High yield#Government# Δ Capitalisation		0.0753** (0.0315)	-0.0140 (0.0694)
High yield#Domestic# Δ Capitalisation		0.1172 (0.0932)	-0.1385 (0.1464)
Government#Domestic# Δ Capitalisation		0.2964*** (0.1101)	-0.0410 (0.1507)
High yield#Government#Domestic# Δ Capitalisation		-0.6619*** (0.1617)	-0.0170 (0.2309)
Observations	291,420	289,786	289,786
R-squared	0.4257	0.4267	0.4266
Bond x Banking system FE	Yes	Yes	Yes
Bond x Time-period FE	Yes	Yes	Yes

Note: *** $p < 0.01$, ** $p < 0.05$, * $p < 0.1$. Column 2 estimates Equation (1). The dependent variable is the quarter-on-quarter change in a banking system's holdings of an individual bond i as a percentage of the total amount outstanding of this bond. Columns 1 and 2 use ratio of Tier 1 equity to risk weighted assets (i.e., the Tier 1 ratio) as the measure of bank capitalization, and Column 3 replaces this measure with Tier 1 equity to total assets (i.e., the Leverage ratio). Standard errors are clustered at the bond level. Statistical significance is largely unaffected when clustering at the banking system level or double clustering at the banking system-quarter level.

both high yield and government; high yield and domestic; government and domestic; and finally, high yield, government and domestic. The latter category is especially important, as it models the joint importance of the regulatory arbitrage and risk-shifting hypotheses in the adjustment process.

There is evidence that faced with adverse solvency shocks, banking systems exploit the fact that solvency regulations place a zero risk weight on sovereign debt. As result, when banking systems buy government debt, this does not reduce their Tier 1 ratio. Despite the introduction of the banking union, EU banking systems appear to exploit this feature

Figure 4: Effect on bond holdings of a decline in the Tier 1 ratio



Note: the dots indicate the estimated percentage point change in bond holdings after a one percentage point decline in the Tier 1 ratio, within their 95 percent confidence interval. These marginal effects are obtained using the results from estimating Equation (1) that are displayed in Column 2 of Table 2.

of solvency regulation by shifting into higher yielding domestic government debt after an adverse solvency shock. Figure 4 displays the marginal effects estimated using Column 2 of Table 2, which show that a one percentage point decline in the Tier 1 solvency ratio suggests a 0.40 percentage point increase in a banking system's holdings of high yielding domestic government debt. Higher yielding domestic sovereign debt is generally longer duration debt, and while we cannot observe the banking system's hedging activities, this asset substitution suggests that solvency ratios could underestimate the overall riskiness of the banking system.

While holdings of sovereign debt are not constrained by solvency regulations, there is also further evidence of risk-shifting within the constraints of regulation. A one percentage point decline in the Tier 1 ratio suggests a 0.16 percentage point increase in the banking system's holdings of low yielding domestic private sector assets. Note that these assets are highly correlated with the solvency of the domestic banking system; in the relatively extreme circumstances under which these relatively safe domestic assets default, the domestic banking system is likely to be in default as well. These assets are therefore

especially attractive for risk-shifting purposes. Moreover, the risk weights used in solvency regulations limit the ability of banks to risk-shift by buying higher-yielding private sector assets. Indeed, banks reduce their exposure to private sector, high yielding foreign debt. To wit, after an adverse solvency shock, banks appear to adjust their bond portfolio in order to gamble on the performance of domestic assets by increasing the home bias in their bond portfolio within the constraints of solvency regulation.

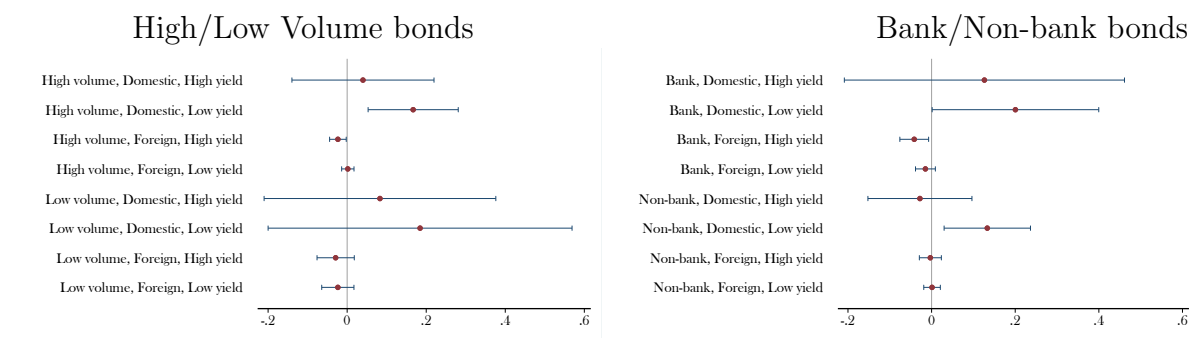
Rather than reflecting risk-shifting, this greater home bias in the banking system's bond portfolio after an adverse solvency shock is also consistent with models of endogenous information acquisition (Van Nieuwerburgh and Veldkamp, 2009). Because domestic banks are likely better informed about domestic assets than their foreign competitors, these models predict that domestic banks might exploit their comparative information advantage in domestic assets to create “safer” portfolios that overweight on domestic assets after an adverse shock – a “flight to safety”. Weighing against this information interpretation is the fact that domestic banks would not be expected to have any relative valuation advantage for sovereign debt, especially after an adverse solvency shock. But differences in market capitalization among private sector bonds provide another means of evaluating this information narrative.

If indeed information differences explain the above home bias result, then this information narrative would also predict that domestic banks would disproportionately increase their exposure to small capitalization private sector domestic bonds. These bonds are generally thinly traded and domestic banking systems will likely have an even greater informational advantage in valuing these bonds relative to foreign investors. From the left panel in Figure 5, if anything domestic banking systems increase their exposure to the large capitalization domestic private sector bonds. This panel focuses on the specification in Column 2 of Table 2, but allows the coefficients to vary depending on whether the bonds have a low market capitalization or a high market capitalization—for concision the regression estimates are omitted and available upon request. Moreover, because systematic rather than idiosyncratic factors drive the performance of these large capitalization bonds, these bonds covary positively with the performance of the domestic banking system, making

risk-shifting the more likely explanation. In fact, there is no evidence that domestic banks significantly exploit their information advantage in small market capitalization bonds after an adverse solvency shock.

The right panel in Figure 5 provides further evidence in favor of the risk-shifting hypothesis. This panel again focuses on the specification in Column 2 of Table 2, but now distinguishes between the effects on private sector bonds issued by banks and by non-banks. Clearly, the performance of domestic bank debt is most highly correlated with the performance of the domestic banking system. And some models note further that distressed banks can have an incentive to herd, collectively buying each other's debt, in order to increase the risk of failing together and precipitate a collective bailout (Acharya and Yorulmazer, 2007). EU bailout regulations are also more lenient when crises are systemic. Consistent with this form of the risk-shifting hypothesis, the panel suggests that after a one percentage point decline in the Tier 1 ratio, the domestic banking system increases its holdings of lower yielding domestic bank debt by 0.2 percentage points. Measuring the information set of investors is generally difficult, but this evidence weighs against the information cum flight to safety hypothesis

Figure 5: Effect on private sector bond holdings of a decline in the Tier 1 ratio



Note: the dots indicate the estimated percentage point change in private sector bond holdings after a one percentage point decline in the Tier 1 ratio, within their 95 percent confidence interval. These marginal effects are obtained using the results from estimating Equation (1) that are displayed in Column 2 of Table 2, but allows the coefficients to vary depending on whether the bonds have a low market capitalization or a high market capitalization (left panel) or depending on whether the bonds are issued by banks or by non-banks (right panel). For concision the point estimates are omitted and available upon request.

A key objection to these results is that shocks to solvency might proxy for other balance sheet shocks, such as asset quality, that ultimately explain adjustment. For example, banking systems that experience an increase in funding costs because of creditor concerns about the system’s asset quality, might rotate into sovereign debt to signal the quality of assets. At the same time, poor asset quality could eventually lead to losses and a depletion of Tier 1 equity, inducing a spurious association between contemporaneous equity shocks and the above observed portfolio adjustments.

Our results are unchanged if we identify Tier 1 solvency shocks as the residual from a first order autoregressive process, suggesting that changes in Tier 1 capital do not mechanically proxy for other unobserved balance sheet outcomes.¹⁵ But European banking regulations provide an important falsification test that can partially address the concern that changes in the Tier 1 ratio proxy for other relevant balance sheet characteristics that may not be directly related to risk-weighted solvency regulation. The leverage ratio, the ratio of Tier 1 equity to total assets instead of risk-weighted assets, supplements the risk based solvency ratio in the US regulatory system, but was not introduced into European banking regulation until the very end of our sample—January 2018; prior to that banks had to merely report this ratio.

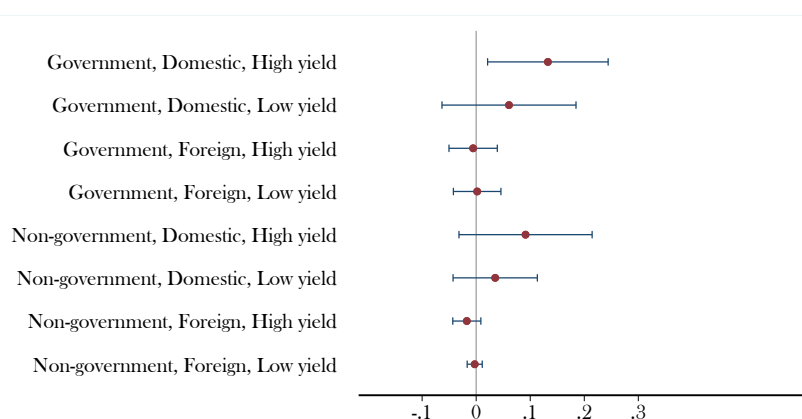
Since the numerator in the leverage ratio also captures shocks to Tier 1 equity, it also proxies for other balance shocks that could ultimately explain the pattern of adjustment. Hence, if the shocks to the Tier 1 ratio proxy for other balance sheet shocks rather than for shocks to risk-weighted solvency constraints, replacing the change in the Tier 1 ratio with the change in the leverage ratio should yield approximately similar results.

However, if the results in Column 2 reflect the deliberate adjustment of banking systems to regulatory solvency shocks, then changes in the leverage ratio should yield insignificant results: regulators did not require banks to target changes in leverage in the European context until the very end of the sample period. To examine this, Column 3 in Table 2

¹⁵ In particular, we estimate $Tier1_{jt} = \alpha_j + \beta Tier1_{jt-1} + v_{jt}$ using quarterly data, and replace $\Delta Tier1_{jt}$ with v_{jt} in Column 2 of Table 2. The results, available on request, are very similar to those shown in Table 2.

is based on the same specification as in Column 2, except that it uses the change in the leverage ratio instead of the change in the Tier 1 ratio. The leverage ratio interactions are less precisely estimated and economically very small. As Figure 6 shows, in the one case where the effect of the leverage ratio shock is significant – the case of domestic government high yield debt – the implied effect is about 75 percent smaller than that obtained when using the Tier 1 ratio.

Figure 6: Effect on bond holdings of a decline in the Leverage ratio



Note: the dots indicate the estimated percentage point change in bond holdings after a decline in the Leverage ratio, within their 95 percent confidence interval. These marginal effects are obtained using the results from estimating Equation (1) that are displayed in Column 3 of Table 2. The decline in the Leverage ratio is equal to the decline in the Tier 1 ratio in Figure 5, scaled by the difference in standard deviations of both measures.

We have seen evidence that EU banking systems appear to engage in regulatory arbitrage and risk shifting after solvency shocks. But it is difficult to exclude alternative interpretations based on unobserved heterogeneity, and we next build on an enormous theoretical and empirical literature that emphasizes the importance of compensation incentives among senior bankers in determining bank risk-taking incentives.¹⁶ In the current setting, these arguments observe that high-powered equity based compensation contracts can amplify greatly senior management’s incentives to shift risks onto depositors and other debt holders, and gamble on an increase in the price of bank equity (Bebchuk and Spa-

¹⁶ See for example Bolton, Scheinkman, and Xiong (2006), Bolton, Hamid, and Shapiro (2011), and Laeven and Levine (2009).

mann, 2010). Using new data from the European Banking Authority on the distribution of senior management compensation between fixed and variable pay components, Table 3 examines whether the relative importance of variable pay compensation affects banking systems' responses to solvency shocks.

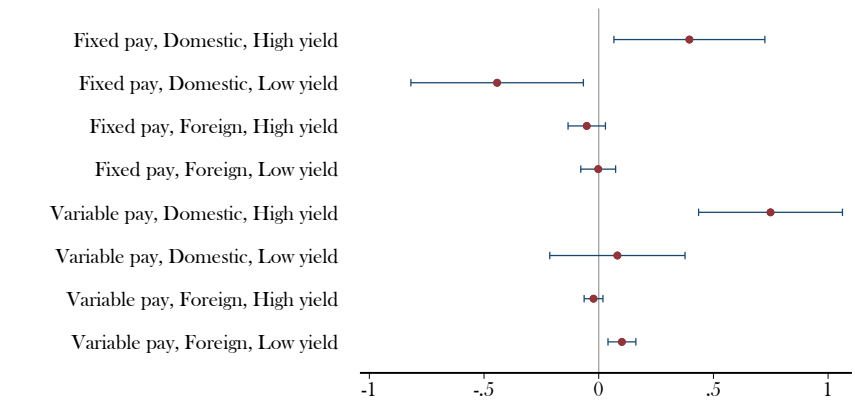
Table 3: Banking system sub-sample analysis: fixed vs high variable pay countries

Variables	Fixed pay (1)	Variable pay (2)	Difference (3)	Fixed pay (4)	Variable pay (5)	Difference (6)
Δ Tier 1	0.0477*** (0.0167)	0.0100 (0.0092)	-0.0376** (0.0182)	0.0457*** (0.0171)	0.0117 (0.0108)	-0.0340* (0.0196)
High yield# Δ Tier 1	-0.0221 (0.0333)	0.0674*** (0.0196)	0.0895** (0.0383)	-0.0106 (0.0347)	0.0219 (0.0177)	0.0326 (0.0379)
Government# Δ Tier 1	0.0151 (0.0340)	-0.0717*** (0.0200)	-0.0868** (0.0381)	-0.0435 (0.0424)	-0.1129*** (0.0328)	-0.0693 (0.0511)
Domestic# Δ Tier 1	-0.1700** (0.0758)	-0.1315*** (0.0479)	0.0385 (0.0914)	-0.2285* (0.1171)	-0.0902 (0.0645)	0.1383 (0.1379)
High yield#Government# Δ Tier 1				0.0607 (0.0654)	0.1018** (0.0413)	0.0411 (0.0751)
High yield#Domestic# Δ Tier 1				0.2896 (0.2151)	0.0451 (0.1162)	-0.2445 (0.2533)
Government#Domestic# Δ Tier 1				0.6692*** (0.2268)	0.1099 (0.1700)	-0.5593* (0.2960)
High yield#Government#Domestic# Δ Tier 1				-1.1780*** (0.3365)	-0.8365*** (0.2503)	0.3415 (0.4324)
Observations	277,694	Same	Same	276,255	Same	Same
R-squared	0.4300			0.4312		
Bond x Banking system FE	Yes			Yes		
Bond x Time-period FE	Yes			Yes		

Note: *** $p < 0.01$, ** $p < 0.05$, * $p < 0.1$. Column 4 reports estimates from Equation (1) for bond holdings of banking systems in countries with mostly fixed pay, Column 5 reports estimates for bond holdings of banking systems in with a high proportion of variable pay, and Column 6 reports the differences between both samples. The remuneration data is published annually by the European Banking Authority and is available for Austria, Belgium, Cyprus, Germany, Spain, Finland, France, Italy, Luxembourg, the Netherlands and Portugal. All estimates in Columns 4-6 are obtained from a single regression specification, which is equal to a version of Equation (1) where the regressors are interacted with a dummy variable for bond holdings of banking systems in fixed/variable pay countries. The dependent variable is the quarter-on-quarter change in a banking system's holdings of an individual bond i as a percentage of the total amount outstanding of this bond. Standard errors are clustered at the bond level. The estimates in Columns 1-3 are obtained in a similar way.

Specifically, the compensation data – the banking system's mean ratio of variable to fixed pay – are annual, and we estimate the main specification while allowing the coefficients to differ depending on whether banking systems are below or above the median ratio of variable to fixed pay. Note that this ratio itself varies considerably over the sample with a mean of 0.8 and a standard deviation of 0.4. Columns 1 and 2 of Table 3 show that for

Figure 7: Effect on government bond holdings of a decline in the Tier 1 ratio



Note: the dots indicate the estimated percentage point change in government bond holdings after a one percentage point decline in the Tier 1 ratio, within their 95 percent confidence interval. These marginal effects are obtained using the results from estimating Equation (1) while allowing the coefficients to vary depending on whether the banking systems have a relatively high fixed pay or variable pay component in senior management compensation. For concision the point estimates are omitted and available upon request.

a one percentage point decline in solvency, banking systems with above median variable pay compensation schemes—variable pay systems—significantly rebalance their portfolio towards government debt relative to systems with more low-powered compensation schemes. Figure 7, which selectively plots the marginal effects from the granular specifications in Columns 4 and 5, also points to important differences between both types of banking systems within the category of government debt. Notably, variable pay banking systems increase their exposure to high yielding domestic government debt almost twice as much as fixed pay systems, and unlike fixed pay systems do not reduce their exposure to domestic government debt emanating from lower yielding bonds. These findings suggest that reach for yield-cum-risk shifting behavior might be more pronounced in banking systems where senior management’s compensation is more closely tied to the equity performance of the banks. To be sure, our data does not include retirement and long-term deferred compensation – inside debt – and this evidence should thus be viewed as suggestive (Sundaram and Yermack, 2007).

4.1 Robustness and extensions

This subsection considers various robustness exercises. One concern is that these results might be driven mainly by the very under capitalized banking systems. With a smaller equity cushion, an adverse solvency shock can make it even more attractive for banks in these systems to shift into zero risk weighted assets like sovereign debt. Higher yielding sovereign debt assets can be especially attractive, as it can help rebuild a banking system's equity cushion faster. Systems that are closer to insolvency might also have greater incentives to gamble on domestic assets. Of course, when there is an EU wide guarantee, risk shifting incentives might be similar for all banking systems.

Table 4: Banking system sub-samples: low/high solvency

Variables	High Tier 1 (1)	Low Tier 1 (2)	Difference (3)	High Tier 1 (4)	Low Tier 1 (5)	Difference (6)
Δ Tier 1	0.0048 (0.0103)	-0.0117 (0.0175)	-0.0166 (0.0202)	0.0005 (0.0128)	0.0080 (0.0206)	0.0074 (0.0241)
High yield# Δ Tier 1	0.0245 (0.0198)	0.0605** (0.0274)	0.0360 (0.0336)	0.0210 (0.0191)	-0.0015 (0.0325)	-0.0225 (0.0376)
Government# Δ Tier 1	-0.0430** (0.0204)	-0.0090 (0.0306)	0.0340 (0.0366)	-0.0755*** (0.0293)	-0.0753* (0.0454)	0.0002 (0.0537)
Domestic# Δ Tier 1	-0.0875** (0.0404)	-0.1680*** (0.0351)	-0.0806 (0.0537)	-0.0637 (0.0627)	-0.2177*** (0.0490)	-0.1540* (0.0797)
High yield#Government# Δ Tier 1				0.0601 (0.0418)	0.1220* (0.0673)	0.0619 (0.0790)
High yield#Domestic# Δ Tier 1				0.0100 (0.0996)	0.1779* (0.0931)	0.1679 (0.1364)
Government#Domestic# Δ Tier 1				0.2286* (0.1209)	0.2973*** (0.0973)	0.0687 (0.1563)
High yield#Government#Domestic# Δ Tier 1				-0.7363*** (0.1821)	-0.6109*** (0.1660)	0.1254 (0.2485)
Observations	291,420	Same	Same	289,786	Same	Same
R-squared	0.4258			0.4270		
Bond x Banking system FE	Yes			Yes		
Bond x Time-period FE	Yes			Yes		

Note: *** $p < 0.01$, ** $p < 0.05$, * $p < 0.1$. Column 4 reports estimates from Equation (1) for bond holdings of banking systems with a high Tier 1 ratio, i.e., a Tier 1 ratio above the median for all banks in a year-quarter. Column 5 reports estimates for bond holdings of banking systems with a low Tier 1 ratio, and Column 6 reports the differences between both samples. All estimates in Columns 4-6 are obtained from a single regression specification, which is equal to a version of Equation (1) where the regressors are interacted with a dummy variable for bond holdings of banking systems with a low/high Tier 1 ratio. The dependent variable is the quarter-on-quarter change in a banking system's holdings of an individual bond i as a percentage of the total amount outstanding of this bond. Standard errors are clustered at the bond level. The estimates in Columns 1-3 are obtained in a similar way.

Table 4 examines these hypotheses. Columns 1 and 2 estimate the most basic specification separately for banking systems that have above median and below median regulatory solvency ratios respectively. Among the systems with a lower solvency ratio, a one percentage point decline the Tier 1 ratio is associated with a 0.18 percentage point increase in the system's position in domestic bonds; this effect is nearly twice that of systems with a higher Tier 1 ratio in Column 1. There are also differences in the adjustment of these two systems towards government debt. At the same time, Column 3 shows that these differences are not statistically significant.

Columns 4 and 5 use the more granular regressions to understand better these differences in adjustment margins across banking systems. Banking systems with a lower solvency ratio shift disproportionately into private, low yielding domestic debt after an adverse solvency shock – the constrained risk-shifting hypothesis. A one percentage point negative solvency shock suggests a 0.21 percentage point increase in the holdings of private sector, low-yielding domestic bonds; among the systems with a higher solvency ratio, this adjustment margin is statistically insignificant. Within the category of domestic high-yielding government debt, banking systems above and below the median solvency ratio respond similarly. Taken together, distressed banking systems that are closer to insolvency increase their exposure to domestic assets to a greater extent. But the shift into government high yielding assets appear similar across the two systems.

We next check whether our results are driven mainly by the EU countries with high public debt levels—like Portugal or Spain. Some versions of the risk-shifting hypothesis predict that banking systems in these more heavily indebted countries might be more likely to increase their exposure to higher yielding domestic government debt after an adverse equity shock. However, if banks, operating as fixed income investors, have a target return on equity, then the required shift into domestic government debt in order to meet their target return on equity might be smaller in heavily indebted countries, as yields on those bonds would already be significantly higher than the yield on the equivalent maturity government bond in a low debt country (Gale, 2010; Hanson et al., 2015).

To gauge the impact of government indebtedness, Columns 1 and 2 of Table 5 estimate

Table 5: Banking system sub-samples: low/high government debt

Variables	Low debt (1)	High debt (2)	Difference (3)	Low debt (4)	High debt (5)	Difference (6)
Δ Tier 1	0.0088 (0.0103)	-0.0050 (0.0168)	-0.0138 (0.0193)	0.0040 (0.0127)	0.0165 (0.0199)	0.0125 (0.0232)
High yield# Δ Tier 1	0.0257 (0.0199)	0.0568** (0.0265)	0.0311 (0.0324)	0.0214 (0.0190)	0.0007 (0.0316)	-0.0207 (0.0363)
Government# Δ Tier 1	-0.0535*** (0.0206)	0.0077 (0.0290)	0.0612* (0.0348)	-0.0883*** (0.0291)	-0.0562 (0.0445)	0.0321 (0.0524)
Domestic# Δ Tier 1	-0.1145*** (0.0409)	-0.1642*** (0.0347)	-0.0497 (0.0536)	-0.0741 (0.0583)	-0.2433*** (0.0509)	-0.1691** (0.0775)
High yield#Government# Δ Tier 1				0.0680 (0.0418)	0.0915 (0.0654)	0.0234 (0.0769)
High yield#Domestic# Δ Tier 1				0.0056 (0.0959)	0.2078** (0.0952)	0.2021 (0.1352)
Government#Domestic# Δ Tier 1				0.3538** (0.1381)	0.2927*** (0.0935)	-0.0611 (0.1678)
High yield#Government#Domestic# Δ Tier 1				-1.2017*** (0.2140)	-0.5208*** (0.1552)	0.6809** (0.2649)
Observations	291,420	Same	Same	289,786	Same	Same
R-squared	0.4257			0.4268		
Bond x Banking system FE	Yes			Yes		
Bond x Time-period FE	Yes			Yes		

Note: *** $p < 0.01$, ** $p < 0.05$, * $p < 0.1$. Columns 4 reports estimates from Equation (1) for bond holdings of banking systems in countries with a low government debt ratio, Column 5 reports estimates for bond holdings of banking systems in countries with a high government debt ratio, and Column 6 reports the differences between both samples. All estimates in Columns 4-6 are obtained from a single regression specification, which is equal to a version of Equation (1) where the regressors are interacted with a dummy variable for bond holdings of banking systems in countries with a low/high government debt ratio. The dependent variable is the quarter on quarter change in a banking system's holdings of an individual bond i as a percentage of the total amount outstanding of this bond. Standard errors are clustered at the bond level. The estimates in Columns 1-3 are obtained in a similar way.

separately the less granular specification for countries with below median government debt to GDP ratios (Column 1) and those above the median of this ratio (Column 2). There are suggestive differences in adjustment across these two subsamples. While a one percentage point drop in the solvency ratio is associated with a 0.05 percentage point increase in a banking systems' net position in government debt in systems located in less indebted countries, this effect is not significant in the more indebted subsample. Column 3, which computes the difference across the two specifications, suggests that these differences are only significant at the 10 percent level.

To understand better these effects, Columns 4 and 5 estimate the more granular specifi-

cation separately for the two subsamples. Consistent with the target return hypothesis, the evidence suggests that adverse solvency shocks induce a larger shift into domestic higher yielding government debt in less indebted countries. A one percentage point decrease in regulatory solvency is associated with a 0.91 percentage point increase in a banking system's net position in higher yielding domestic government debt in the below median debt sample, but only a 0.21 percentage point increase in the more heavily indebted countries. Instead, these banking systems in more heavily indebted countries appear to increase their relative exposure to low-yielding, domestic, private sector debt.

5 Price dynamics

We have seen evidence that banking systems adjust their bond portfolio in response to solvency shocks in ways that can potentially make the banking system riskier than its regulatory solvency ratio might suggest. These risks can in turn be transferred onto the banks' assets. Beginning with Grossman and Miller (1988), a large and influential theoretical literature has hypothesized that the capital position of intermediaries – market makers, broker-dealers and other large participants in a market – can influence market liquidity and pricing.¹⁷

A central idea in these models is that when markets are incomplete, financial institutions might be forced to sell assets at some future date in order to meet their regulatory solvency constraints or obtain liquidity.¹⁸ In the interim, potential buyers of these assets must hold liquidity. But since holding liquidity is costly, the potential buyers of these assets will only do so if they can recoup the costs thereof by buying these assets at fire-sale prices. In our current setting, consider a bond that is mainly owned by an undercapitalized banking system. If the banking system fails, then asset liquidations, including the sale of the bond, would be needed to payoff creditors. If the cash-in-the market to absorb these potential

¹⁷ See also Allen and Gale (2005), Brunnermeier and Pedersen (2009), He and Krishnamurthy (2013), and Brunnermeier and Sannikov (2014).

¹⁸ Rajan and Ramcharan (2016) and Ramcharan (2020) provide evidence of this fire-sale channel within the context of banking.

sales is limited, then bonds predominantly owned by intermediaries closer to insolvency should trade at a discount relative to otherwise similar bonds owned by intermediaries further away from regulatory insolvency. A related set of arguments note that banking-system distress that either precipitates a sovereign bailout, or increases expectations of such a bailout can increase domestic sovereign yields (Acharya, Drechsler, and Schnabl, 2014).¹⁹

To investigate these hypotheses, for each bond in the sample we construct its exposure to country-banking system solvency shocks. Specifically, let s_{ijt} denote country banking system j 's share of bond i at time t . For example, if the German banking system owned 30 euro of a bond that has a total market capitalization of 100 euro, then the German banking system's share of this bond i at time t would be 0.3. We then use s_{ijt} to compute the bond's exposure to solvency shocks: $\Delta\overline{Tier1}_{it} = \sum_j s_{ijt}\Delta Tier1_{jt}$. We next use this variable as a factor in pricing the bond:

$$\Delta Yield_{it} = \alpha_i + \alpha_{it}^{sector} + \alpha_{it}^{country} + \alpha_{it}^{maturity} + \beta\Delta\overline{Tier1}_{it} + e_{it}. \quad (2)$$

Note that because a bond's exposure to banking system solvency shocks is weighted by the banking system's ownership share of the bond, reverse causality is less likely to bias these estimates. In particular, each bond itself constitutes a very small share of the overall assets or even bond portfolio of a country-banking system. Hence, unobserved adverse shocks to an individual bond are unlikely to both increase the bond's yield and reduce country-banking system's solvency ratios.

Nevertheless, we saturate Equation (2) with issuing sector-by-year-quarter fixed effects to absorb time varying sector level shocks that could contaminate inference. For example,

¹⁹While bank asset holdings are generally confidential, investors can infer the composition of a banking systems' bond holdings through various regulatory releases. For example, twice a year the IMF publishes the Coordinated Portfolio Investment Survey with holder and issuer details. The BIS publishes quarterly data on locational and consolidated basis allowing for a measure of bank holdings of government bonds (https://www.bis.org/publ/qtrpdf/r_qt1403i.pdf). And, finally, the European Banking Authority publishes a breakdown of the exposures of banks in the banking union in its 'Transparency Exercise'. Taken together, these sources provide investors with reasonable albeit low frequency information on banks' bond holdings.

adverse economic news that increases all sovereign bond yields in a given quarter could also force banking systems to mark to market losses. Issuing sector-by-time fixed effects can non-parametrically control for these shocks. In addition, we include issuing country-by-year-quarter fixed effects to absorb common geographic shocks across bonds. At the bond-level, we control for residual maturity of the bond, which helps controls for the term structure of risk-free interest rates (Timmer, 2018).

Table 6: Changes in solvency and bond yields

Variables	(1) ΔYield	(2) ΔYield	(3) ΔYield	(4) ΔYield
$\Delta\overline{\text{Tier1}}$	-0.1881*** (0.0447)	-0.1407*** (0.0473)	-0.1170** (0.0457)	-0.0784 (0.0500)
Government $\#\Delta\overline{\text{Tier1}}$		-0.2159** (0.0965)		-0.1973** (0.0917)
High yield $\#\Delta\overline{\text{Tier1}}$			-0.1543** (0.0729)	-0.1454** (0.0728)
Observations	177,864	177,864	176,841	176,841
R-squared	0.2587	0.2587	0.2685	0.2685
Bond FE	Yes	Yes	Yes	Yes
Residual maturity x Time FE	Yes	Yes	Yes	Yes
Issuing sector x Time FE	Yes	Yes	Yes	Yes
Issuing country x Time FE	Yes	Yes	Yes	Yes

Note: *** $p < 0.01$, ** $p < 0.05$, * $p < 0.1$. Column 1 estimates Equation (2). The dependent variable is the quarter on quarter change in the percentage yield on an individual bond i . Standard errors are clustered at the bond level.

Table 6 reports the results from estimating Equation (2). The dependent variable is the change in the yield of an individual bond. Consistent with the prediction that bonds owned by distressed intermediaries might face greater fire-sale risk, Column 1 shows significant evidence that an increase in a bond's exposure to negative solvency shocks is associated with an increase in its yield. A one percentage point decline in the weighted average solvency is associated with a 0.19 percentage point increase in a bond's yield.

We next focus on whether these results vary depending on whether or not the bond is issued by a government. Column 2 interacts the weighted change in the Tier 1 ratio with

an indicator variable that equals 1 if the bond is issued by a government and 0 otherwise. The evidence strongly suggests that yields on government bonds are significantly more sensitive to banking systems' solvency shocks. For private sector bonds, a one percentage point decline in the weighted solvency ratio is associated with a 0.14 percentage point increase in yields. But for a government bond, the same sized solvency shock suggests a 0.36 percentage point increase – more than double the private sector response. This result is consistent with both the fire-sale and doom-loop hypotheses.

Columns 3 and 4 show further that the greater sensitivity of government bonds to solvency shocks is not an artifact of the yield on the bond itself. Column 3 allows the effect of the solvency shock to depend on whether the bond is high-yielding. Solvency shocks have an effect more than two times bigger on higher-yielding less liquid bonds than the baseline magnitude. Column 4 combines the interaction terms, allowing the impact of weighted solvency shocks to vary depending on whether the bond is high-yielding, and whether the bond is issued by a government. The evidence in Column 4 shows that the effect of solvency shocks on bond yields are concentrated in these two types of bonds.

We have already seen that solvency shocks to banking systems induce portfolio adjustments at these systems, and a key concern is that these changes in yields reflect changes in relative demand among banking systems rather than the fire-sale hypothesis. That is, an adverse solvency shock to a country's banking system could decrease that banking system's relative demand for certain kinds of bonds, thereby increasing the yield on the bond. To address this possibly mechanical form of bias, Table 7 replicates Table 6, but includes the change in the holdings of each bond among all banking systems. The change in holdings is clearly jointly determined along with yields, but the impact of a bond's weighted exposure to solvency shocks is unchanged. From Column 1 of Table 7 for example, the coefficient on the Tier 1 variable is -0.17, while the corresponding coefficient in Table 6 is -0.19.

Disaggregating the data by domestic and foreign bond holdings can help us tell apart more easily whether the fire-sales or the sovereign risk hypothesis explain the larger impact of solvency shocks on government bond yields. Under the sovereign risk hypothesis, it is the domestic governments that would be expected to bail out its own banking system. And

Table 7: Changes in solvency and bond yields while controlling for changes in holdings

Variables	(1) Δ Yield	(2) Δ Yield	(3) Δ Yield	(4) Δ Yield
$\Delta \overline{\text{Tier1}}$	-0.1677*** (0.0444)	-0.1199** (0.0469)	-0.1018** (0.0457)	-0.0593 (0.0500)
Δ Holdings	-0.0217*** (0.0022)	-0.0178*** (0.0019)	-0.0049*** (0.0011)	0.0011 (0.0019)
Government# $\Delta \overline{\text{Tier1}}$		-0.2425** (0.0966)		-0.2333** (0.0914)
Government# Δ Holdings		-0.0402*** (0.0123)		-0.0470*** (0.0123)
High yield# $\Delta \overline{\text{Tier1}}$			-0.1400* (0.0724)	-0.1352* (0.0722)
High yield# Δ Holdings			-0.0298*** (0.0038)	-0.0323*** (0.0042)
Observations	177,864	177,864	176,841	176,841
R-squared	0.2610	0.2618	0.2719	0.2730
Bond FE	Yes	Yes	Yes	Yes
Residual maturity x Time FE	Yes	Yes	Yes	Yes
Issuing sector x Time FE	Yes	Yes	Yes	Yes
Issuing country x Time FE	Yes	Yes	Yes	Yes

Note: *** $p < 0.01$, ** $p < 0.05$, * $p < 0.1$. The dependent variable is the quarter on quarter change in the percentage yield on an individual bond i . The change in holdings is calculated as the percentage point change in the holdings of bond i by the sum of all banking systems in the sample. Standard errors are clustered at the bond level.

thus, when the nationality of the banking system and the government is the same, shocks to the solvency of the banking system should have the largest effect on domestic government yields. In contrast, distress at banking systems does not increase the contingent liabilities of the foreign government. As such, any negative relationship between solvency shocks and foreign government debt likely reflects the fire-sale hypothesis rather than the cost of any sovereign bail-out.

Column 1 of Table 8 thus again uses the weighted exposure of a bond to changes in solvency of the banking system, where as before the weight is that banking system's share of the bond. However, the specification now computes this weighted exposure separately

Table 8: Changes in solvency and domestic and foreign bonds yields

Variables	(1) Δ Yield	(2) Δ Yield	(3) Δ Yield	(4) Δ Yield
Domestic# $\overline{\Delta$ Tier1	-0.1499*** (0.0577)	-0.0532 (0.0665)	-0.0616 (0.0683)	0.0268 (0.0764)
Foreign# $\overline{\Delta$ Tier1	-0.2310*** (0.0684)	-0.2608*** (0.0661)	-0.1758*** (0.0558)	-0.1882*** (0.0618)
Government#Domestic# $\overline{\Delta$ Tier1		-0.4049*** (0.0837)		-0.3596*** (0.0789)
Government#Foreign# $\overline{\Delta$ Tier1		0.1567 (0.2405)		0.1225 (0.2312)
High yield#Domestic# $\overline{\Delta$ Tier1			-0.1744** (0.0844)	-0.1784** (0.0844)
High yield#Foreign# $\overline{\Delta$ Tier1			-0.1354 (0.1371)	-0.1579 (0.1331)
Observations	177,864	177,864	176,841	176,841
R-squared	0.2587	0.2587	0.2685	0.2685
Bond FE	Yes	Yes	Yes	Yes
Residual maturity x Time FE	Yes	Yes	Yes	Yes
Issuing sector x Time FE	Yes	Yes	Yes	Yes
Issuing country x Time FE	Yes	Yes	Yes	Yes

Note: *** $p < 0.01$, ** $p < 0.05$, * $p < 0.1$. The dependent variable is the quarter on quarter change in the percentage yield on an individual bond i . Standard errors are clustered at the bond level.

for whether the banking system is from the same country as the bond issuer. Adverse solvency shocks to banking systems both increase the yield on domestic bonds and on foreign bonds that they hold. But the point estimate on the weighted change in solvency shocks is about 50 percent larger for foreign bonds than for domestic bonds, suggesting that foreign bonds face the greater liquidation risk.

Column 2 allows the effect of a weighted solvency change to also depend on whether the bond is issued by a government. There are striking differences across the effect of solvency changes. A one percentage point decrease in the weighted solvency is associated with about a 0.1 percentage point increase in the yields on foreign government bonds, but this effect is not significant. This result is consistent with the idea that shocks to banking systems do

not increase the contingent liabilities of foreign governments. At the same time, yields on foreign private sector bonds increase by 0.26 percentage points after a 1 percentage point decline in solvency, which suggests that foreign private sector bonds are more sensitive to fire sales.

But the impact of solvency shocks on bond yields is especially large for domestic government bonds. In this case, a one percentage point decline in the solvency of the banking system suggests a 0.47 percentage point increase in the yield of domestic government debt that is owned by the banking system. This result is consistent with the prediction that banking-system distress that either precipitates a sovereign bailout, or increases expectations of such a bailout can increase domestic sovereign yields. Note that this result is not driven by mechanical relative demand effects, as we have already seen that solvency shocks increase the demand for domestic sovereign debt, which would cause yields to decline. Columns 3 and 4 of Table 8 check whether these results are driven by illiquid higher yielding assets. The differential effects between domestic and foreign banking systems on government bonds persist. Moreover, especially higher yielding bonds decline in price after a negative solvency shock, which is consistent with the idea that riskier bonds are more sensitive to fire sales.

6 Conclusion

This paper uses new granular bond portfolio data across the European Union to study how banking systems adjust their asset holdings in response to regulatory solvency shocks in the period after the EU harmonized banking regulation across its member states and centralized supervision within the ECB. We find evidence that banks risk-shift within the constraints of solvency regulation. Adverse solvency shocks for example induce banking systems to increase their exposure at the intensive margin to domestic higher yielding government bonds. Domestic assets are highly correlated with the survival of the domestic banking system, and we also find that banking systems increase their exposure to these bonds after adverse shocks. These effects are especially strong for banking systems where

variable pay accounts for a greater share of senior management compensation.

We also study the effects of these bank solvency shocks on bond prices. We find significant evidence that a decline in the solvency of a banking system increases the yields on the bonds in its portfolio. These effects are largest for high yielding illiquid bonds and for government bonds, especially domestic government bonds. This is consistent with the hypothesis that the potential for future disorderly asset liquidations by distressed sellers can affect current yields, and that domestic banking sector distress increases the contingent liabilities of the domestic government.

Taken together, these results suggest that risk-based solvency regulation interacts with the risk-shifting hypothesis to explain banking systems' portfolio adjustments after an adverse regulatory solvency shock. The shift into more illiquid assets, the decline in asset diversification, and the increased exposure to common shocks suggest that banking systems might be even riskier than their distance to regulatory insolvency might suggest. The impact of solvency shocks on bond yields also shows how distress in banking systems can feedback onto asset prices in the economy by creating an "overhang" of future asset liquidations. Moreover, while we cannot measure the extent of bank-risk taking incentives in the absence of the banking union, this evidence suggests that the banking union in its current version might only imperfectly represent the interests of member states when banking systems suffer solvency shocks. The empirical estimates in this paper could be used for general equilibrium modeling exercises that aim to quantify the effectiveness of regulation and of solvency shocks on bank-risk taking behavior and asset prices.

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