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BASEL II: THE REVISED FRAMEWORK OF JUNE 2004

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Abbreviations

ALM asset and liability management
AMA Advanced Measurement Approach

BCBS Basel Committee on Banking Supervision of the BIS
BIS Bank for International Settlements, Basel, Switzerland

CF commodities finance

CP1 A New Capital Adequacy Framework, BCBS 1999
 CP2 The New Basel Capital Accord, BCBS, January 2001
 CP3 The New Basel Capital Accord, BCBS, April 2003

EAD exposure at default

ECAIs external credit assessment institutions

ECAs export credit agencies

EL expected losses

FSI Financial Stability Institute of the BIS **HVCRE** high-volatility commercial real estate

IAA internal assessments approach

IASB International Accounting Standards Board

IASCF International Accounting Standards Committee Foundation

ICBA Independent Community Bankers of America

IOSCO International Organisation of Securities Commissions

IPRE income-producing real estate

IRB internal ratings-based approach of the BCBS

LGD loss given default

M maturity
OF object finance

OTC over the counter derivatives
PD probability of default

PF project finance

QIS3 Quantitative Impact Study 3

QRREs qualifying revolving retail exposures

RBA ratings-based approach

RF International Convergence of Capital Measurement and Capital Standards: a Revised

Framework

SF Supervisory Formula

SMEs small and medium-sized enterprises

SPE special purpose entity
UL unexpected losses

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Abstract

The June 2004 document of the Basel Committee on Banking Supervision (BCBS), International Convergence of Capital Measurement and Capital Standards: a Revised Framework (RF), is designed to be the culmination of the process beginning in 1999 to replace the 1988 Basel Capital Accord of 1988 with a New Basel Capital Accord (Basel II). The basic components of Basel II were first fleshed out in the consultative paper of 2001. These consist of three Pillars and a number of alternative approaches to the setting of numerical capital requirements. Under the first Pillar these components include two basic approaches to the numerical capital requirements for credit risk, the Standardised and the Internal Ratings-Based (IRB) approaches, and alternative options for the capital requirements for operational risk. Under the Standardised approach the calibration of risk is based on the assessments of external credit assessment institutions (ECAIs), an important role for this purpose being attributed to credit rating agencies. Under the IRB approach there are two basic versions of different degrees of sophistication, "foundation" and "advanced", reliance on banks' own internal ratings for the inputs used to estimate risk weights and exposures being greater under the latter than under the former. Conditions for eligibility for the two versions of the IRB approach and the three alternative options for operational risk are also spelled out. The second and third Pillars are supervisory review of capital adequacy and market discipline through standards for disclosure.

A major aim of Basel II has been to revise the rules of the 1988 Basel Capital Accord in such a way as to align banks' regulatory capital more closely with their risks, taking account of progress in the measurement and management of risk and of the opportunities which these provide for strengthened supervision. Achievement of this aim has involved the incorporation in Basel II of methods for quantifying banking risks introduced since the late 1980s. The task of the designers of Basel II has been complicated by the way in which the BCBS's rules for banks' capital, originally intended for the internationally active banks of its member countries, have become a global standard widely applied in developing as well as developed countries. Acceptance of this role by the BCBS has entailed a global consultation process, whose results have been reflected in three consultative papers and the RF, and the different approaches and options for setting numerical capital requirements which are intended to accommodate banks and supervisors of different levels of sophistication.

As well as providing a commentary on the main features of the RF this paper documents the response of the BCBS to some of the more important points which were raised during this consultation process, including the outcome of decisions taken at a meeting in Madrid in October 2003 following comments on the consultative paper of April 2003, and summarises the results of the most recent of the BCBS's initiatives to estimate the quantitative impact of the Basel II rules on banks' capital. This discussion includes a review of papers issued by the BCBS as part of the last stage of its work preceding the RF.

Implementation of Basel II will be a large-scale exercise, making major demands on bank supervisors and requiring extensive technical assistance, especially for developing countries. The paper summarises the published results of a questionnaire of the Financial Stability Institute sent to more than 100 non-BCBS countries with the intention of providing an idea of the extent and envisaged timeframe for implementation of Basel II as well as of other issues such as choices of different approaches and options for the setting of capital requirements.

A. THE DEVELOPMENT OF BASEL II

The June 2004 document of the Basel Committee on Banking Supervision (BCBS), *International Convergence of Capital Measurement and Capital Standards: a Revised Framework* (henceforth RF), follows a series of three consultative papers on a New Basel Capital Accord (Basel II) stretching back to 1999.

The first of these papers, A New Capital Adequacy Framework (CP1), contained a sketch of basic components of the subsequent, progressively more elaborated versions of Basel II. Under the first so-called Pillar these components included two basic approaches to the numerical standards for banks' capital adequacy, the Standardised and the Internal Ratings-Based (IRB) approaches. Under the standardised approach the calibration of risk was finer than in the 1988 Basel Capital Accord and was to rely on the assessments of external credit assessment institutions (ECAIs), an important role for this purpose being attributed to credit rating agencies. The second and third Pillars were supervisory review of capital adequacy and market discipline through standards for disclosure. More explicit recognition than in the 1988 Basel Capital Accord – if feasible through quantitative capital charges – was proposed for interest-rate risk in the banking book and for operational risk. The paper also included new approaches to the treatment of securitised assets and of credit risk mitigation.

The nine-part, 500-page *The New Basel Capital Accord* of January 2001 (CP2), provided a more fleshed-out picture of the likely eventual shape of Basel II.² However, many of the detailed proposals were acknowledged to be still provisional or lacking important elements. Under the IRB approach there were two basic versions of different degrees of sophistication, "foundation" and "advanced", reliance on banks' own internal ratings for the inputs used to estimate risk weights and exposures being greater under the latter than under the former. Moreover there was a classification of exposures by six broad categories: corporate, sovereign, bank, retail, project finance, and equity. Conditions for eligibility for the two versions of the IRB approach were spelled out. And three options also of progressively greater sophistication were proposed for quantifying the capital required for operational risk.

The third in the series, also entitled *The New Basel Capital Accord* (CP3), was issued in April 2003 and was a step forward in comparison with CP2 in both coherence and completeness.³ But greater coherence was not accompanied by a reduction in complexity. Much of this complexity has been due to the attempt to set global standards for the regulatory capital of banks at different levels of sophistication. It has also reflected the BCBS's response to continuing rapid financial innovation and

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