Australian Government Guarantee Scheme for Large Deposits and Wholesale Funding

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Australian Government Guarantee Scheme for Large Deposits and Wholesale Funding

Ariel Smith¹

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Abstract

The Australian Guarantee Scheme for Large Deposits and Wholesale Funding was developed in 2008 shortly after the failure of Lehman Brothers. It was designed to foster financial-system stability and confidence, and to help authorized deposit-taking institutions (ADIs) to continue to access funding during a period of volatility. In addition to a guarantee for large deposits, the scheme allowed ADIs to apply for a government guarantee for wholesale liabilities with maturities of up to five years; in return, the ADIs paid the government a monthly fee based on their credit rating and the value of the debt guaranteed. The entire Guarantee Scheme became operational in November 2008 and closed to new issuance in March 2010, by which point 16 ADIs had issued around $166 billion AUD ($108.73 billion) of guaranteed securities. The Guarantee Scheme’s wholesale funding component formally ended in October 2015, a few months after the final guaranteed instrument matured. It incurred no losses, no claims were made against it, and it earned $4.5 billion AUD ($2.95 billion) in fees for the support provided. The Guarantee Scheme is considered successful, as it allowed ADIs to continue to access funding markets and effectively supported the Australian financial system and economy through the global financial crisis.

Keywords: Wholesale funding, government guarantee, ADIs, guaranteed instruments

¹ Research Associate, New Bagehot Project. Yale Program on Financial Stability. arielsmith@yale.edu.
At a Glance

After the failure of Lehman Brothers in September 2008, there was “broad uncertainty about the stability of the global financial system and the ability of banks to access new funding.” The adverse effects of the burgeoning global financial crisis limited the ability of Australian ADIs (authorized deposit-taking institutions) to access global long-term wholesale markets, “and what funding occurred was at spreads that were significantly wider than normal” (Schwartz and Tan 2016).

On October 12, 2008, the Australian government announced the creation of a scheme that included guarantee arrangements for ADI funding: the Australian Guarantee Scheme for Large Deposits and Wholesale Funding. This Guarantee Scheme was administered by the Reserve Bank of Australia and became operational on November 28, 2008. ADIs could access a government guarantee for their wholesale liabilities with maturities of up to five years (less in the case of foreign bank branches). In exchange for the government guarantee, ADIs paid the government a monthly fee based on their credit rating and the value of the debt guaranteed (Schwartz and Tan 2016, Reserve Bank of Australia 2013, Schwartz 2010).

The Guarantee Scheme was designed to support confidence in ADIs and “ensure that an otherwise sound ADI would not experience financial distress due to a shortage of funding.” Additionally, as similar schemes were simultaneously being implemented worldwide, the Guarantee Scheme was designed as a response to ensure that Australian ADIs remained on equal footing with institutions that had access to similar programs (Schwartz and Tan 2016).

The Guarantee Scheme’s wholesale funding component closed to new issuance on March 31, 2010, by which time beneficiaries had issued approximately $166 billion AUD ($108.73 billion) of guaranteed securities, the majority of which was long-term wholesale funding. The final guaranteed security matured in March 2015, and the scheme formally closed on October 24, 2015 (Reserve Bank of Australia 2013, Schwartz 2010). It incurred no losses and earned $4.5 billion AUD ($2.95 billion) in fees in return for the support provided (Schwartz and Tan 2016).

Summary Evaluation

The Guarantee Scheme is seen as successful, given that it allowed ADIs to continue to access funding markets and effectively supported the Australian financial system and economy through the crisis.
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I. Overview

Background

One of the international effects of the global financial crisis was a dearth of liquidity at the end of 2008 and an enormous perceived risk for large banks. As a result, “international long-term wholesale funding markets essentially closed to non-sovereign borrowers” (Schwartz 2010). Australia’s banking system was robust at the time of the global financial crisis; however, as ADIs (authorized deposit-taking institutions) experienced restricted access to funding, especially in international long-term wholesale funding markets, investors became reluctant to buy long-term bank debt, and the lack of access had “potentially serious implications for liquidity and lending activity” (Reserve Bank of Australia 2012, Schwartz 2010).

It was against this backdrop that the Australian government created the Government Guarantee Scheme for Large Deposits and Wholesale Funding as part of its other measures created in response to the global financial crisis (Reserve Bank of Australia 2013).

Program Description

The Australian Government Guarantee Scheme for Large Deposits and Wholesale Funding, also known as the Guarantee Scheme, was announced by the government on October 12, 2008, and began on November 28, 2008 (Reserve Bank of Australia 2012). It was administered by the Reserve Bank of Australia on behalf of the Australian government (Reserve Bank of Australia 2013). The government announced that the Guarantee Scheme would remain open until markets normalized, rather than establishing a set expiration date (Schwartz 2010). This case will only deal with the wholesale funding component of the scheme.

The Scheme had three objectives: “to protect depositors of banks, building societies and credit unions incorporated in Australia, and policyholders of general insurers from potential loss due to the failure of these institutions; to provide depositors with prompt access to their deposits that were protected under the FCS; and to support the stability of the Australian financial system” (Australian Prudential Regulation Authority).

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2 The Guarantee Scheme had two components: one was a wholesale funding guarantee and one was a deposit guarantee. “The deposit guarantee component ensured that up until February 1, 2012, deposits up to and including $1 million in eligible ADIs – including banks, buildings societies and credit unions – were guaranteed by the Australian Government without charge. For customers with total deposit balances over $1 million at a single ADI, a guarantee was available on that portion of their balances over $1 million under the Guarantee Scheme subject to an approval process and other conditions, including the payment of a monthly fee by the ADI on the amounts guaranteed. The $1 million amount applied even if the deposits were spread across multiple accounts in the same institution. After February 1, 2012, a new permanent cap of $250,000 per person per institution on deposits guaranteed under the Financial Claims Scheme took effect” (Reserve Bank of Australia 2012).
The wholesale funding component of the Guarantee Scheme allowed Australian ADIs to issue securities with maturities of up to five years (less in the case of foreign bank branches)\(^3\) that were fully guaranteed by the Australian government (Reserve Bank of Australia 2013, Schwartz 2010). The government does not appear to have established minimum maturity requirements for eligible debt. The government did not place a limit on the total value of liabilities it would cover (Schwartz and Tan 2016).

The issuance of these securities was split into two processes: one for short-term liabilities (with maturities of less than 15 months)\(^4\) and the second for long-term liabilities (with maturities of 15 to 60 months)\(^5\) (Government Guarantee Scheme Rules 2012). Institutions eligible for the scheme included banks, building societies, and credit unions. To apply for the scheme, an institution had to complete an Eligibility Certificate provided by the Reserve Bank of Australia (acting as the program’s “Scheme Administrator”). Further, after an ADI had been approved for a guarantee, it had to provide a separate certificate for each type of liability (Schwartz 2010).

An eligible short-term liability took the form of senior unsecured debt instruments in any currency with maturities less than 15 months. The instruments could be issued in bearer, registered, or dematerialized form. The instruments could not be complex, and had to fall in the categories of bank bills, CDs or TDs, debentures or commercial paper, and applications could be made for issuance programs (Government Guarantee Scheme Rules 2012).

An eligible long-term liability took the form of senior unsecured debt instruments in any currency with maturities of 15 to 60 months.\(^6\) The instruments could be issued in bearer, registered or dematerialized form. The instruments could not be complex, and had to fall in the categories of bonds, notes or debentures, and applications could be made for issuance programs (Government Guarantee Scheme Rules 2012).

All guaranteed liabilities were subject to a monthly fee, which was for eligible debt issued on or after November 28, 2008. The ADI was required to pay this fee within seven business days of the last calendar day of each month in arrears (Reserve Bank of Australia 2012, Guarantee Scheme Rules). The amount of the fee depended on both the credit rating of the ADI (lower rated institutions had to pay a higher fee to access the guarantee) and the value of the guaranteed liabilities. The same fee applied regardless of the term of the debt (Reserve Bank of Australia 2012). The fee ranged from 70 to 150 basis points per annum depending on the credit rating of the ADI.\(^7\)

Finally, “all Australian institutions were required to have systems in place to identify separately guaranteed liabilities and other liabilities. For wholesale liabilities, systems had

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\(^3\) Foreign branches had restricted access to the Guarantee Scheme (Schwartz 2010).

\(^4\) For specific information on this process, refer to Government Guarantee Scheme Rules 2012.

\(^5\) Ibid.

\(^6\) Potential interview question – Caused some confusion

\(^7\) For short term liabilities only, the following applied: in calculating the value of these liabilities, the gross proceeds of the fund raising were to be used (Government Guarantee Scheme Rules 2012).
to be in place before the guaranteed liabilities were issued” (Government Guarantee Scheme Rules 2012).

There were several preventative measures built into the Guarantee Scheme. Any institution seeking involvement had to have approval from the Australian Prudential Regulation Authority (APRA). Foreign bank branches, “which were subject to less Australian supervisory oversight,” had multiple additional restrictions for participation. The liabilities guaranteed by foreign banks had shorter maturity limits (initially set until December 31, 2009, and later extended to a rolling 15-month maturity); “total guaranteed liabilities could not exceed 110 percent of the average daily value of short-term liabilities and deposits in the 30 days prior to the announcement of the scheme; and their guaranteed liabilities could not be used to directly support the foreign branch outside Australia or the obligations of its parent or any related entity.” Finally, The Council of Financial Regulators (an agency that served in an advisory capacity during the Guarantee Scheme’s creation and operation) required monitoring of exposures and regular reports on both individual bank exposures and foreign branch activities (Schwartz and Tan 2016).

**Outcomes**

The Guarantee Scheme’s wholesale funding component had an immediate effect on Australian institutions. ADIs had only issued bonds worth $2 billion ($1.31 billion)\(^8\) in the three months before the Guarantee Scheme’s introduction, but in the program’s first three months, they issued $73 billion of bonds, of which $70 billion was guaranteed through the program (Schwartz and Tan 2016).

The Guarantee Scheme’s peak use came during its initial period of operation, “when risk aversion among investors was highest” (Schwartz and Tan 2016, Schwartz 2010).

As markets began to reopen, use of the Guarantee Scheme eased (seen below in Figure 1). In late 2008, guaranteed bonds represented 100 percent of total bond issuance; by late 2009, they only represented around 30 percent. Guaranteed short-term wholesale funding peaked in February 2009 at $22.4 billion, but quickly fell to around $17.1 billion by January of the next year (Schwartz 2010, Schwartz and Tan 2016).

Australia’s four main banks (Commonwealth Bank, Westpac Banking Corporation, National Australia Bank, and Australia and New Zealand Banking Group) represented the Guarantee Scheme’s largest users. However, “issuance as a share of liabilities was higher among non-major Australian banks.” Before the crisis, these non-major banks chose not to issue many bonds, and instead operated in residential mortgage-backed securities markets. However, the crisis made these markets unpalatable, and the non-major banks responded by making significant use of the Guarantee Scheme and issuing large amounts of guaranteed bonds (Schwartz and Tan 2016). This pattern can be seen below in Figure 2.

\(^8\) The monthly average spot rate in November 2008 was $1 = $1.5266 AUD
ADIs predominantly used the Guarantee Scheme’s wholesale funding component for long-term liabilities. The majority of short-term debt issuance came from non-major ADIs, which is partly explained by the fact that, as part of the Guarantee Scheme’s slew of safeguards, foreign-owned branches were not allowed to issue guaranteed debt with maturities greater than 15 months (Schwartz and Tan 2016).

By June 2009, as global markets became healthier, banks began issuing unguaranteed bonds. Guaranteed bonds, which had accounted for almost all bond issuance following the Guarantee Scheme’s implementation, fell close to zero issuance in early 2010. “This reflected that the sharp compression in bank bond spreads over 2009 was more
pronounced for unguaranteed bonds than for guaranteed bonds, particularly for higher-rated issuers. As a result, it was generally advantageous for the AA-rated banks to issue unguaranteed rather than issuing guaranteed and incurring the associated fee” (Schwartz 2010).

On February 7, 2010, the government announced that the Guarantee Scheme’s wholesale funding component would close to new issuance on March 31, 2010. Any ADI that wished to apply for the program had until March 24, 2010, and ADIs could issue guaranteed liabilities up to and including March 31, 2010. After March 31st, any liabilities already covered under the Guarantee Scheme “would remain guaranteed until either they matured or were bought back and extinguished by the issuer,” and ADIs were required to keep paying monthly fees on these guaranteed liabilities (Schwartz 2010, Schwartz and Tan 2016).

By the time the Guarantee Scheme’s wholesale funding component closed to new issuance on March 31st, the beneficiaries had issued around $166 billion AUD of guaranteed liabilities. At that time, the amount of guaranteed wholesale funding represented around 15 percent of all wholesale liabilities. Ultimately, the monthly fees generated by the Guarantee Scheme totaled $4.5 billion in government revenue (Reserve Bank of Australia 2013, Schwartz 2010, Schwartz and Tan 2016).

The amount of guaranteed bonds began to fall after the closure of the Guarantee Scheme to new issuance as previously issued guaranteed bonds matured. This fall in stock was compounded by buybacks: as the markets improved, and the maturity profiles of the remaining guaranteed debt shortened (approximately 12 and 18 months remaining to maturity), the cost of issuing government-guaranteed debt became more expensive than issuing unguaranteed debt. Thus ADIs began repurchasing their debt, at first in small amounts, but increasing as conditions improved9 (Schwartz 2010, Schwartz and Tan 2016). ADIs repurchased around $16 billion of guaranteed bonds by mid-2012. Some of the biggest issuers of guaranteed bonds began large-scale repurchases in late 2012 and early 2013, during which time they bought back around $15 billion of guaranteed bonds. These buybacks contributed to a decline in the stock of guaranteed bonds to around $57 billion, as seen below in Figure 3 (Reserve Bank of Australia 2013).

9 The first buyback of guaranteed debt occurred early in mid-2009, but buyback activity was not prominent until 2011 (Schwartz and Tan 2016).
Non-major ADIs bought back a larger share of their guaranteed debt than did major ADIs, even though major ADIs accounted for over half of total buybacks in absolute terms. While major ADIs bought back $33 billion (about 33 percent of their issuance under the Guarantee Scheme), non-major ADIs bought back around $25 billion of guaranteed debt, which represented just over 50 percent of their issuance (Schwartz 2010, Schwartz and Tan 2016).

The scheme’s final bond matured in early 2015; and the scheme formally ended in October 2015 (Reserve Bank of Australia 2012).

Source: Reserve Bank of Australia 2013.
II. Key Design Decisions

1. The Guarantee Scheme represented one piece in a comprehensive response to the global financial crisis.

This included a cut in interest rates and multiple stimulus packages (Kennedy 2009).

2. The Guarantee Scheme derived its legal authority from the Financial Claims Scheme.

The Australian Parliament created the Financial Claims Scheme in 2008, with three objectives: “to protect depositors of banks, building societies and credit unions incorporated in Australia, and policyholders of general insurers from potential loss due to the failure of these institutions; to provide depositors with prompt access to their deposits that were protected under the FCS; and to support the stability of the Australian financial system” (Australian Prudential Regulation Authority).

3. The Guarantee Scheme was administered by the Reserve Bank of Australia.

4. There does not appear to have been a cap on the program’s size.

This was a contrast to most other similar schemes (Schwartz and Tan 2016).

5. Only certain authorized deposit-taking institutions were eligible to have their liabilities guaranteed by the Guarantee Scheme’s wholesale funding component.

The Reserve Bank of Australia supplied a list of eligible ADIs, and these included: Australian-owned banks; Australian-incorporated ADIs which were subsidiaries of foreign banks; branches of foreign banks; building societies; credit unions; and a small category for four “other” ADIs. For a complete list of eligible institutions by name, see “Eligible Institutions” in Key Program Documents.

Any institution seeking involvement in the scheme had to have approval from the Australian Prudential Regulation Authority (APRA).

Foreign bank branches, “which were subject to less Australian supervisory oversight,” had multiple additional restrictions for participation. The liabilities guaranteed by foreign branches had shorter maturity limits (initially set until December 31, 2009, and later extended to a rolling 15-month maturity); “total guaranteed liabilities could not exceed 110 percent of the average daily value of short-term liabilities and deposits in the 30 days prior to the announcement of the scheme; and their guaranteed liabilities could not be used to directly support the foreign branch outside Australia or the obligations of its parent or any related entity” (Schwartz and Tan 2016).

This restricted access reflected that, “unlike the foreign bank subsidiaries, foreign bank branches were not separate entities incorporated and independently capitalized in Australia – they were part of a foreign bank incorporated overseas” (Schwartz 2010).
6. Eligible debt took the form of senior unsecured debt instruments.

7. The scheme’s wholesale funding component allowed for the issuance of debt with maturities up to five years.

Australian ADIs could issue securities with maturities of up to five years (foreign bank branches were limited to 15 months) that were guaranteed in full by the Australian government (Reserve Bank of Australia 2013, Schwartz 2010).

This maximum maturity was relatively long compared to similar international schemes, and it “allowed ADIs more flexibility to lengthen maturities and avoid bunching of refinancing risk” (Schwartz and Tan 2016). The government does not appear to have established minimum maturity requirements for eligible debt.

The Guarantee Scheme employed two different participation processes based on the maturity of the issued debt. The processes were identical except for differences in the long-term liability process. For a complete breakdown of these differences, refer to the Government Guarantee Scheme Rules in Implementation Documents.

8. All currencies were eligible for the scheme’s wholesale funding component.

9. For the most part, there does not appear to have been a cap on any individual institution’s participation in the scheme’s wholesale funding component.

Foreign branches were limited to 110% of the average daily value of their short-term liabilities and deposits in the 30 days prior to the Scheme’s announcement.

10. A monthly fee was payable to the government based on the value of liabilities subject to guarantee.

All guaranteed liabilities were subject to a monthly fee, which applied to eligible liabilities issued on or after November 28, 2008. The ADI was required to pay this fee within seven business days of the last calendar day of each month in arrears (Reserve Bank of Australia 2012, Australian Government 2012). The amount of the fee depended on both the credit rating of the ADI (lower rated institutions had to pay a higher fee to access the guarantee) and the value of the guaranteed liabilities. The same fee applied regardless of the term of the debt (Reserve Bank of Australia 2012).

The fee was calculated by using the following formula\(^{10}\):

\[
\text{Fee payable} = \]

\(^{10}\) For short term liabilities only, the following applied: in calculating the value of these liabilities, the gross proceeds of the fund raising were to be used (Government Guarantee Scheme Rules 2012).
Guaranteed liabilities x relevant fee x number of calendar days in month / 365

The “relevant fee” was prescribed as seen in the chart below.

<table>
<thead>
<tr>
<th>Long Term Credit Rating of ADI</th>
<th>Fee (in basis points per annum)</th>
</tr>
</thead>
<tbody>
<tr>
<td>AAA to AA-</td>
<td>70</td>
</tr>
<tr>
<td>A+ to A-</td>
<td>100</td>
</tr>
<tr>
<td>BBB+ and below and Unrated</td>
<td>150</td>
</tr>
</tbody>
</table>

The guarantee fees were designed around multiple variables. These variables included “international settings, pricing for risk, and the need to ensure that the arrangements did not continue indefinitely.” The fees were due monthly rather than up-front to avoid putting additional pressure on ADIs that were already experiencing liquidity issues (Schwartz 2010, Schwartz and Tan 2016).

The fees were set between the risk spreads at the time of the Guarantee Scheme’s creation (a time of extreme market stress) and spreads seen to be likely during normal market conditions. The fee structure was “designed to act as a natural exit mechanism, so that when pricing of risk improved, the yield spread between unguaranteed and guaranteed debt would narrow to below the guarantee fee and it would become cost-effective for issuers to return to unguaranteed issuance,” thus also reducing the government’s liability (Schwartz and Tan 2016, Schwartz 2010).

As such, the fee encouraged ADIs to buy back their debt. As markets improved, and the maturity profiles of the remaining guaranteed debt shortened (approximately 12 and 18 months remaining to maturity), the cost of issuing government-guaranteed debt became more expensive than issuing unguaranteed debt. Thus ADIs began repurchasing their debt, at first in small amounts, but increasing as conditions improved (Schwartz 2010, Schwartz and Tan 2016).

11. The Council of Financial Regulators required participants regularly report their exposures and activities.

Third, the Council of Financial Regulators (an agency that served in an advisory capacity during the Guarantee Scheme’s creation and operation) required monitoring of exposures and regular reports on both individual bank exposures and foreign branch activities. This was a safeguard (Schwartz and Tan 2016).

Second, the government announced that the Guarantee Scheme would remain open until markets normalized. In making this decision, the government and the Council of Financial Regulators considered whether to risk premature closure or “the longer-term costs of an extended period of government support.” Eventually, when the Council of Financial Regulators recommended the government close the program at the end of March 2010, it was because market conditions had improved and the Guarantee Scheme no longer appeared necessary. The ADIs’ use of the Guarantee Scheme “began to appear to be largely a response to small pricing advantages rather than a reflection of problems of market access” (Schwartz 2010).

III. Evaluation

Reviews of the effectiveness of the Guarantee Scheme’s wholesale funding component conclude that it was a successful program. Schwartz (2010) at the Reserve Bank of Australia concluded that it made “a positive and important contribution to the stability of the Australian financial system by ensuring that institutions continued to have access to capital markets during the most intense phase of the crisis. It also ensured that the overall availability of funding was not a material constraint on the capacity of Australian banks to lend and, for a time, served to mitigate the large increase in the cost of issuing debt.”

According to Schwartz and Tan (2016), there are strong grounds to conclude that the Guarantee Scheme’s wholesale funding component was successful. It was able to help stabilize the Australian financial system and allowed Australian institutions to remain on equal footing with their international peers who had access to similar schemes. It was heavily used by both major and non-major ADIs and provided large amounts of funding to the financial sector and thus credit provision to the economy.

Further, the Guarantee Scheme’s wholesale funding component opened and closed at appropriate times, within a defined period of need. It opened quickly in response to a dire turn in global financial markets, and it closed around the time other similar international schemes had started to close and the Australian government believed market conditions had normalized. This “judgment-based closure of the Guarantee Scheme, as opposed to using a pre-announced closure date, successfully avoided potential market uncertainty over whether arrangements would be extended in the lead-up to the pre-announced closure dates” (Schwartz and Tan 2016). As discussed above, the design of the scheme’s wholesale funding component encouraged ADIs to repurchase their debt as market conditions normalized, and this feature “allowed for a faster return to standalone market-based funding and reduction in government contingent liabilities than would otherwise have been the case” (Schwartz 2010, Schwartz and Tan 2016).

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11 Unsure if this means the entire scheme or the wholesale component only (see ambiguous wording at https://www.rba.gov.au/publications/bulletin/2010/mar/4.html).
No claims were made against the Guarantee Scheme, and it incurred no losses – partly reflected by the consideration given to risk during the design process. “It was judged preferable to err on the side of supporting the financial system with simple, easy to understand arrangements, than to impose greater control over exposures through features such as limits or institution-specific pricing” (Schwartz and Tan 2016).

At the time of the Guarantee Scheme’s closure, banks had returned to more normal and stable measures of funding (such as increasing deposit and long-term funding, and reducing the use of short-term wholesale funding). “Such moves were consistent with international efforts to strengthen financial system resilience by regulators and institutions in the wake of the global financial crisis” (Schwartz and Tan 2016).

IV. References


V. Key Program Documents

Summary of Program


Implementation Documents

• **Eligible Institutions** – List of eligible institutions included in the formal document above; lists all ADIs considered eligible to apply for the Guarantee Scheme. https://www.guaranteescheme.gov.au/rules/pdf/schedule-1.pdf


**Legal/Regulatory Guidance**

• **Financial Claims Scheme** – Overview from the Council of Financial Regulators detailing the Financial Claims Scheme, which was the legal authority under which the Guarantee Scheme took place. https://www.cfr.gov.au/about-cfr/financial-distress-planning-management/financial-claims-scheme.html

**Press Releases/Announcements**


**Media Stories**

**Key Academic Papers**


The Australian Financial System in the 2000s: Dodging the Bullet (Davis 2011) – Reserve Bank of Australia publication examining the ability of Australia to cope with the global financial crisis. https://pdfs.semanticscholar.org/d9a5/782b01ea9d4359f6df22a810d68764bb276d.pdf

Reports/Assessments

Guaranteed Issuance as of March 31, 2010
RBA, outstanding liabilities, in billions of AUD.

- $140.1 in Long-term
- $14.3 in Short-term
- $11.3 in Large deposits

Large deposits    Short-term    Long-term
Guaranteed Debt Issuance of Foreign Subsidiaries\(^1\) - March 31, 2010

- ING Direct: $8.62
- Bank of Scotland PLC: $5.84
- Citigroup Pty Limited: $3.94
- The Royal Bank of Scotland PLC: $3.10
- The Royal Bank of Scotland N.V.: $2.75
- Investec Bank (Australia) Limited: $1.16
- WestLB AG: $0.65

\(^1\)The following Foreign Subsidiaries were excluded from the graphic due to low issuance and to improve chart readability: JP Morgan Chase Bank, National Association, The Hongkong and Shanghai Banking Corp. Ltd, UBS AG, Rabobank Australia Ltd, HSBC Australia Ltd, Beirut Hellenic Bank Ltd, State Street Bank and Trust Company, citibank, N.A., Arab Bank Australia Ltd. Each of these issued less than $300 million AUD in guaranteed debt, totaling approx. $500.3 million AUD, or 1.89% of total issuance.
Guaranteed Debt Issuance of Australian Owned Banks\(^1\) - March 31, 2010

- Westpac Banking Corporation: $37.49
- Commonwealth Bank of Australia: $30.21
- National Australia Bank Limited: $18.74
- Macquarie Bank Limited: $16.15
- Australia and New Zealand Banking Group Limited: $16.01
- Suncorp-Metway Limited: $14.04
- Bank of Queensland Limited: $3.48

\(^1\)The following Australian banks were excluded from the graphic due to low issuance and to improve chart readability: Rural Bank Ltd, St. George Bank, Defence Bank Ltd, Mecu Ltd, Bendigo and Adelaide Bank Ltd, Commonwealth Bank of Western Australia, Heritage Bank Ltd, AMP Bank Ltd, and Members Equity Bank Pty Ltd. Each bank issued no more than $1 billion AUD or less in guaranteed debt, totaling approx. $3 billion AUD, or 2.15% of total issuance.