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Libor Transition: International Perspective

Evolution of international policy on benchmark reform

- Cases of attempted manipulation (first reported 2008) threatened the integrity of IBORs; and a significant decline in the liquidity of interbank deposit market threatened their sustainability.
- The Wheatley Review of Libor (2012) concluded that integrity should be addressed through IBOR regulation and reforms; and sustainability through proposals to expand bank submission panels, reduce reliance on expert judgement and, in extremis, public powers of compulsion.
- The FSB Report on Interest Rate Benchmark Reform (2014) recommended a 'multi-rate' approach to provide users with a choice of benchmarks to suit their economic needs: e.g. near risk-free rates (RFRs) for many derivatives; and reformed IBORs for bank lending products.
- A J Bailey's speech *The Future of Libor* (2017) questioned IBOR sustainability: bank panels could not be sustained, let alone expanded, in the absence of transactions. Instead transition to alternative rates would be strongly encouraged, followed by a managed discontinuation of Libor after end-2021.
- Notably, the FSB agreed this approach for Libor, but not for other IBOR's ESMA, the ECB and the JFSA expressed continued support for EURIBOR and TIBOR.

Alternative rates across Libor jurisdictions

Currency	Libor footprint (USD TR)	Selected RFR (launch date)	Incumbent RFR	IBOR alternative
USD	180	SOFR (2018) – secured o/n UST repo rate	EFFR – unsecured o/n deposit rate	None *
GBP	30	SONIA (1997) – unsecured o/n deposit rate	SONIA	None
JPY	30	TONA (1997) – unsecured o/n deposit rate	TONA	TIBOR
CHF	5	SARON (2009) – secured o/n repo rate	SARON **	None
EUR	<2	€STR (2019) –unsecured o/n deposit rate	EONIA – unsecured o/n deposit rate	EURIBOR

^{*} ICE Bank Yield Index, although not yet available, is mooted as a potential alternative.

^{**} SARON replaced TOIS as CHF RFR for IRS markets December 2017.

Progress on Libor transition in UK markets

Market	Transition Status	Comments
Derivatives		 50% of 2019 cleared GBP IRS linked to SONIA, not Libor ISDA fallbacks agreed and set for introduction early 2020
Bonds		 100% of new issue FRNs and covered bonds in 2019 linked to SONIA Over £4bn of legacy bonds amended via consent solicitations
Securitisations		 100% of RMBS, ABS since April 2019 linked to SONIA Good progress on amendments via consent solicitations
Wholesale loans		 Only a few SONIA linked bilateral loans to date But standard docs available, and systems upgrades underway FCA targeting cessation of Libor loan origination Q3 2020
Consumer loans		 Consumer and SME lending linked to Base Rate, not Libor SONIA is highly correlated with Base Rate

How are UK market participants preparing for transition?

Firm	Profile	Actions
BMO Global Asset Management	LDI asset manager with £50bn of pension fund liabilities under management	 April to August 2018: BMO transitioned 95% of their GBP £10bn Libor swap portfolio to SONIA
Associated British Ports	UK's largest port owner and operator	 November 2018: shifted more than £500mm of Libor IRS and XCS to SONIA June 2019: Completed first successful consent solicitation to convert Libor FRN to SONIA
Nationwide Building Society	Second largest provider of household savings and mortgages in the UK	 January 2019: £1bn SONIA Covered Bond April 2019: Converted b/s to SONIA-referencing basis April 2019: £750mm SONIA RMBS November 2019: Converted £2.3bn of Libor-linked bonds to SONIA via consent solicitations. Exploring potential transition of remaining Libor bonds.