



A Better Business Environment for Financial Intermediation Based on the Convergence Program¹ Experience February 2009

This Q&A note illustrates the main features of a proposed financial modernization initiative to support a better business environment for financial intermediation, based on the Convergence Program's 2005-2008 pilot experience in South-East Europe.

The reader will quickly grasp the large reputational and cost efficiency implications for the World Bank Group of this public-private initiative browsing through the five sections of this note: 1) Why financial modernization during the crisis; 2) Essence of financial modernization; 3) The pilot experience of the Convergence Program in financial modernization; 4) How could the World Bank Group promote financial modernization on a larger scale; 5) Convergence Program's origin and main design features.

A. FINANCIAL MODERNIZATION DURING THE CRISIS

1. At the time of crisis, why is a better business environment for financial intermediation a priority? Could this not be considered a post-crisis priority?

Current liquidity, restructuring and solvency interventions in financial institutions worldwide suggest the existence of similar crisis management needs in industrialized and developing countries. Ongoing international coordination efforts of supervisory reform and tightening of prudential standards² confirm the perception of a single crisis management agenda straddling both industrialized and developing countries.

This notwithstanding, it is important to realize that different starting conditions call for a differentiated policy response to serve the long-term needs of developing countries.

The structural deleveraging of the financial sector will have a bigger impact on the structure and reach of financial intermediation³ of developing countries, unless efficient regulatory adjustment processes are introduced that enable a more fluid matching of supply and demand of financial services, also through the roll-out of new products and services to serve unmet client needs.

An accelerated modernization of the business environment for financial intermediation is therefore an urgent policy priority, if developing countries want to de-couple from the eventual adverse impact of tighter prudential standards and higher risk aversion.

¹ Launched in 2005 by the World Bank with support from Italy's Ministry of Economy and Finance, the Convergence Program has tested innovative techniques to promote financial sector modernization.

² Financial Stability Forum, "Report on Enhancing Market and Institutional Resilience-Follow-up on implementation", October 2008; Group of Thirty, "Financial Reform: A Framework for Financial Stability", January 2009

³ World Economic Forum, "The Future of the Global Financial System - A Near-Term Outlook and Long-Term Scenarios", January 2009

B. ESSENCE OF FINANCIAL MODERNIZATION

2. What does financial modernization mean?

“Financial modernization refers to the process of financial innovation and organizational improvements in the financial system that reduces asymmetric information, increases the completeness of markets, increases opportunities for agents to engage in financial transactions through contracts, reduces transaction costs and increases competition”, said Gertrude Gumpel-Gugerell, a European Central Bank Executive Board Member.

Financial modernization⁴ is therefore the process to adapt the legal and regulatory framework to address market failures and hence improve market outcomes⁵.

3. How does financial modernization relate to financial stability?

The most important conceptual difference⁶ between the market efficiency and the prudential approaches is that the former aims at creating a secure legal and regulatory environment for matching demand and supply of financial services, whereas the latter focuses solely on mitigating the financial intermediation risks to the fiscal authorities (and regulating market conduct with unsophisticated investors).

4. How do authorities pursue financial modernization?

Authorities find it more difficult to pursue financial modernization than financial stability for several important reasons.

First, market efficiency work is penalized by a conceptual framework that is less established than the one adopted for prudential issues (e.g., international standards and codes). The European Central Bank criteria recalled above provide a useful path, as the extensive empirical work on market failures done in the European Union.

Second, execution of market efficiency work is more complex than prudential work because of the large number of “lower value” market structure and legal framework aspects affecting efficiency⁷. Market efficiency work requires a strong programmatic approach and robust implementation mechanism capable to mobilize large-scale resources over a protracted period of time. The experience of the Financial Sector Action Plan⁸ in the European Union is an example of a programmatic approach that involves large groups of authorities and experts over a multi-year time horizon.

⁴ P.Hartmann, F.Heider, E.Papaioannou and M. Lo Duca, [“The role of financial markets and innovation in productivity and growth in Europe”](#), ECB Occasional Paper 72, September 2007

⁵ A primer on market failures: Oxera, [“When markets fail: lessons for policy makers”](#), November 2008

⁶ Lucas Papademos, [“Price stability, financial stability and efficiency, and monetary policy”](#), 7 July 2006

⁷ As an indication of the number of market efficiency issues as seen by market participants, the Italian Banking Association is involved in several hundreds of market efficiency issues affecting their members.

⁸ The EU FSAP provided for 42 major legal initiatives to be undertaken in the 1999-2004 period.

Third, as financial modernization programs are run by Governments and Parliaments – and not by Central Banks that have a narrower financial stability mandate, this work requires much stronger coordination among various authorities in charge – with a less central role of financial authorities.

Fourth, market efficiency needs to be anchored in how markets actually work, placing large value on collaboration and feedback mechanisms with the financial community.

5. Can you elaborate on the need for collaboration with market participants?

Twenty years of overcoming complex market failures have convinced the European Union⁹ that an open and inclusive¹⁰ market consultation process is vital to design what are called “incentive-compatible” regulations¹¹.

When it comes to identifying market failures and design remedial solutions, the practitioner’s eyes and experience are essential. They must inform policy options. But they should not prevail over policy choices. Hence it is important for countries to establish a robust and sustainable public-private cooperation framework. A recent McKinsey Quarterly article¹² is an authoritative call for a responsible dialogue between corporations and authorities in response to the crisis.

6. Does a financial modernization program include prudential issues?

It is important to acknowledge that market efficiency work, although conceptually distinct from core prudential work¹³, may well involve, amongst others, prudential considerations that require full involvement of financial authorities.

As well established work processes exist for the formulation of prudential regulations, financial authorities do not have strong incentives to bring core prudential issues under a financial modernization program. This notwithstanding, they may wish to avail themselves of the programmatic thrust of a financial modernization program (and related implementation arrangements) to accelerate prudential work.

7. Improving financial intermediation efficiency seems to be a worthy cause, but how can this be executed in countries with weaker institutional environment?

The Convergence Program has developed a practical conceptual framework to identify regulatory intervention needs to address market failures and has designed an effective and cost-efficient operating methodology to process them (“Better Regulation” through the SPI Platform), as part of a large modernization program (10-15 projects annually).

⁹ http://ec.europa.eu/civil_society/consultations/index_en.htm

¹⁰ The European Commission has promoted the creation of FIN-USE, a panel of experts mandated to represent the views of consumers and SMEs in market consultations, and pays for its operations.

¹¹ The UK can be considered the EU Better Regulation leader (<http://www.berr.gov.uk/whatwedo/bre/index.html>)

¹² McKinsey Quarterly, “[Managing regulations in a new area](#)”, December 2008

¹³ Core prudential regulations refer to governance, risk management, capital and liquidity requirements.

C. CONVERGENCE PROGRAM EXPERIENCE

8. The Convergence Program has piloted the financial modernization public-private approach in South-East Europe. Why did you start this activity?

As I will explain more fully in the last section of this note, I was intrigued by the large number of issues involved in market efficiency, the need for diverse technical knowledge, the focus on implementation practicalities and the level of energy required to implement a large ongoing reform program (it may consist of 15-30 projects annually). This agenda looked promising because it reflected an important reality outside World Bank reach.

9. What were your first steps?

Before starting with the first concrete projects, I spent about six months with a group of former senior central bankers of the region to define the rules of the game of a public-private approach¹⁴ in the financial sector. The experience of my colleagues mattered a lot in calibrating the approach. Then, in the first year, we did three projects in Romania, Albania and Croatia with a specific angle to take into account the views of market participants in the preparation of the conclusions.

While broadly successful, these projects did not generate demand for more work along these lines. The missing element was an “institution” that would be capable to represent the public-private constituency on an ongoing basis. I had no choice but to significantly increase the stakes to avoid failure of the experiment.

Hence we developed the idea, in Romania, to promote the establishment of an ad-hoc institution, SPI Romania (SPI stands for Special Projects Initiative), that would be responsible for the processing of a large financial sector modernization program. Through SPI Romania, we could test the idea of executing a large modernization program as it would be done in London or Brussels. The idea was successful in terms of results obtained. The Romanian stakeholders decided to become financially and operationally responsible for this program about one year from its launch.

10. Too fast. While it is good to know that Romania appreciated this public-private approach, it would be important first to have an understanding of the projects undertaken. How do they relate to traditional World Bank Group advisory activities?

Well, the SPI Romania projects are at the same time similar and quite different. But I take this as a sign of “additionality” of the public-private approach. At the surface, the projects have names that resonate with our work: rural lending, payment system, credit bureau.

But, scratching a little bit, several differences emerge. First, each project has a specific objective which is to identify a specific feasible regulatory or legal change that would enable a better market outcome (or that would address a specific market failure). In this

¹⁴ A longer explanation of the Convergence Program preparatory work can be found on questions 34-39.

sense, these projects are much narrower and much simpler than typical World Bank projects which usually aim at a large scale policy/regulatory change. Given the scope of World Bank projects, none of them, taken individually, would probably merit World Bank attention. Second, most of them do not involve prudential measures as they are generally understood (i.e., normative acts in the exclusive jurisdiction of a financial regulator as captured, for instance, in the international standards and codes framework). Also, the reports are written for an executive audience and in particular for the authority in charge of considering the enactment of the proposal. They reflect an analysis conducted by a group of local experts with an evident emphasis on establishing a common ground of understanding on implementation issues. So the projects are really complementary to typical World Bank outputs that are excellent in setting the broad context and short on implementation details.

11. You said that projects are executed by groups of local experts. Can you explain the SPI Romania governance and work processes?

The SPI Platform is based on the principle that the local community must be capable to execute projects with its own expertise, involving international consultants only if needed to fill well-identified knowledge gaps. This discipline builds capacity for sustainable reform and enactment focus. Before I explain how working groups operate, I will provide the SPI Platform governance context.

The SPI Platform is designed for the local public-private community to identify a common modernization program, based on needs and priorities expressed by their members. Some of the priorities may well arise from prior World Bank/IMF interventions, in so far as they have become an expression of local needs and priorities. The SPI Committee, which is the SPI governing body¹⁵, settles on a program after broad consultations with stakeholders gather and sift these needs. Projects are selected that have demonstrable strong public and private gains (based on a preliminary impact assessment) and that can reach a conclusion in three months because a-priori they do not seem to present unresolved policy considerations.

The SPI Committee then asks the SPI Secretariat (with staff hired temporarily by the Convergence Program) to launch implementation. A local leader (either a Central Bank director or a bank CEO) appointed by the SPI Committee takes leadership for project implementation. He or she assembles a public-private working group. The SPI Secretariat prepares a detailed project Terms of Reference and successive analyses as requested by the working group. An essential feature of project analysis is quantification of project outcome in terms of cost efficiencies, lending volume growth or other relevant indicators using Regulatory Impact Assessment techniques. Typically a conclusion with a recommendation is reached after four to five meetings occurring over a three month period. The rule is that the project leader sends a recommendation to the SPI Committee only when the working group has reached consensus. After SPI Committee endorsement and transmission of the recommendation to the enacting authority, the SPI Secretariat

¹⁵ The SPI Committee consists of high-level representatives of the Central Bank, Ministry of Finance, Banking Association and Consumer Protection Agency.

helps project leadership monitor the enactment process and organize, if necessary, advocacy activities.

In summary, the SPI Platform has three components: a) a policy setting body (the SPI Committee); b) the operational engine (SPI Secretariat); and c) the brain (the Project Working Groups).

12. Can you elaborate on how the SPI Romania program was assembled?

The SPI Secretariat prepared the proposed 2007 Program identifying public and private “drivers” for each of the 40 or so projects proposed by authorities and market participants and mapping them according to their expected prevailing impact on financial intermediation (i.e., more business volume, cost efficiencies and better industry client reputation). Among them, the SPI Committee identified 12 projects of highest priority.

For the 2008 Program the SPI Secretariat followed more closely the European Central Bank financial modernization taxonomy. They asked stakeholders to identify proposed regulatory changes that would address market failures in each of the five market inefficiencies typologies (i.e., asymmetry of information, market incompleteness, lack of legal contract to engage in financial transactions, cost inefficiencies and lack of competition). The ECB taxonomy proved very powerful to differentiate proposed projects and to prepare the analytical approach.

13. You mentioned also using Regulatory Impact Assessment techniques?

Yes, the Convergence Program helped the SPI Romania Secretariat and the Project Working Groups assess the economic impact on financial intermediation of the proposed regulatory changes. The results (expected first-year cost efficiencies close to \$ 100 million and a multiple in additional lending opportunities) helped motivate the community to work hard to prepare the reform proposals. The Convergence Program assembled a local panel of financial experts to identify and validate the economic drivers of each regulatory change and the corresponding economic impact. It disseminated the RIA techniques in a large two-day public seminar.

14. What were the tangible results achieved¹⁶?

SPI Romania completed twelve analytical recommendations in one year¹⁷. Three culminated in four laws approved by Parliament and six in self-regulatory actions. With a total budget of less than \$400 thousand (including expensive one-off Convergence Program support), SPI Romania enabled reforms with a first-year economic impact in excess of \$100 million. After six months of activity, SPI Albania can muster two laws approved in Parliament.

¹⁶ SPI Albania and SPI Romania activities: www.spi-albania.eu and www.spi-romania.eu

¹⁷ Details: http://www.spi-romania.eu/admin/filemanager/files/spi_romania_2007_achievements.pdf

An equally meaningful intangible result is the large mobilization of local institutions and experts to execute the program. In Romania they were 33 and more than 120 respectively. In Albania, they were 33 and 60 respectively.

15. Has SPI Albania introduced new practices compared to SPI Romania?

Following interactions with EU financial regulators in several working seminars, the Convergence Program helped SPI Albania staff to adopt a formal “Better Regulation” template for its analytical work. Project analysis starts with project scoping, continues with cost and benefit assessment followed by validation of policy options through market consultations to conclude with a policy recommendation¹⁸.

16. Were any prudential projects handled as part of the SPI Romania and Albania?

The SPI Platform creates a safe space for the authorities to experiment “Better Regulation” on issues they decide to have analyzed with structured feedback from market participants. The National Bank of Romania asked SPI Romania to prepare the plan to adopt IFRS for loan loss provisions. Bank of Albania asked SPI Albania to help prepare the plan for IFRS adoption for financial statements, to update capital adequacy regulation with operational risks and to review the liquidity management regulations. In each of these instances, the SPI project used RIA-based cost-benefit considerations.

17. What are the benefits for financial authorities of a public-private partnership for financial modernization?

Financial authorities are of course large beneficiaries of this partnership. As shown in Romania, Albania and also in Croatia (for the securitization law), authorities receive a well-documented proposal, vetted by an experienced group of local experts supported by international experts when required, that greatly facilitates their subsequent enactment activities. It is like out-sourcing to an accredited institution part of the pre-enactment due diligence. Substantially, this is how regulations are prepared in sophisticated jurisdictions¹⁹. After issuing a concept paper with options for regulatory intervention, authorities aggregate the structured feedback received from the consultation process to prepare a draft regulation – with most of the analytical evidence and option comparison being embedded in the consultation feedback.

The foregoing regards regulatory initiatives originated from the authorities themselves. However, the Convergence Program’s SPI Platform creates also a safe space for consideration of regulatory changes proposed by market participants. In this regard, the SPI Platform allows authorities to greatly increase their regulatory intervention span into areas and issues that are below their priority radar screen and beyond their technical

¹⁸ The EU Better Regulation template is visualized: <http://www.spi-albania.eu/en/2008-program/>

¹⁹ This is the case notably in the UK and the European Union. Bank of England, European Central Bank, Fed New York and Bank of Japan also host permanent practitioners’ panels to discuss market development needs (www.fimlc.org; www.efmlg.org; www.ny.frb.org/fimlg/; www.flb.gr.jp/epage/ehome.htm).

expertise and, through the working group structure, have very large scaling-up possibilities to achieve mass impact.

18. What have the benefits been for the banking community?

Well, with the public-private partnership the banking community leapfrogs its influence on the market efficiency agenda. First, it enjoys the benefits, usually available only in the most advanced financial jurisdictions, of having a structured consultative dialogue with authorities. Second, because of the SPI Platform governance design, it acquires an unprecedented right of initiative (subject to the authorities' non-objection) to initiate the assessment of regulatory initiatives that are important to them. Third, they receive support from a world-class analytical platform that draws on World Bank Group project management and analysis methodologies, integrated by Better Regulation techniques. Fourth, all these benefits accrue without the protracted market participant association governance overhaul that is usually necessary to transform lobbying clubs into effective and trust-worthy dialogue partners of the authorities.

19. And for civil society?

By design, the SPI Platform includes representatives of the consumer protection agency. They participate in the shaping of the financial sector modernization program and in running its projects. In Romania, the agency played a large role in shaping the creation of the Bank Ombudsman and in the design of retail payment features, as well as on the formulation of a consumer financial education strategy. Consumer protection agency participation in SPI projects helps strengthen the retail perspective in financial reform (e.g. financial literacy) and encourages banks to adopt more client-friendly policies.

In Albania, we have reached out to the academic community (with a Memorandum of Understanding with a large University). We want to create opportunities for members of the academic community to participate part-time in project analytical activities and also for students to gain practical experience running surveys.

20. How do you know you have achieved your Program objective?

The Convergence Program objective is reached when the local community is confident and capable to continue under its own responsibility the operations launched by the Convergence Program. Romania reached this stage in early 2008. Albania will reach it in late 2008.

D. HOW COULD THE WORLD BANK GROUP SCALE UP FINANCIAL MODERNIZATION WORK

21. How does World Bank Group financial sector work relate to financial sector modernization?

The World Bank's financial sector work has a prevailing prudential angle (albeit with a less stringent financial stability focus than the one practiced by the IMF). The prudential focus tends to contain and manage financial risks. Its work is driven mainly to fill regulatory gaps, benchmarked against international standards and codes.

Closer to the needs of financial institutions which it supports individually with a range of advisory products, IFC also undertakes projects in several market efficiency policy areas (e.g., it deals with "information asymmetries" through a well-established global credit bureau program; it contributes to "completeness of markets" through mortgage finance and securities market development projects; and it helps reap "cost efficiencies" through projects on payment systems and collateral registries).

22. IFC seems therefore to be well positioned to contribute to financial modernization while the Bank deals with its primary focus (crisis resolution and prudential and supervisory overhaul), suggesting the existence of two complementary and self-reinforcing activities within the World Bank Group.

Indeed the World Bank Group could have a significant impact if it matches its systemic approach in crisis resolution and prudential strengthening with a similar systemic approach on the pace and scope of reform of the business environment for financial intermediation. However, moving from the present project approach to a program approach has its own complexities and resource constraints. Through the Convergence Program experience, IFC will be able to move from projects to programs – with most of the costs being borne by country stakeholders.

23. What is the main message for this proposed World Bank Group initiative?

A World Bank Group initiative to support countries' own capacity to undertake business environment modernization reforms benefiting financial intermediation would be a terrific response to mitigate the long-term fall-out of the crisis. It would give a strong signal that International Financial Institutions invest in the capabilities of our partners that are going to carry forward activities for lasting impact and sustainability.

24. You cast this as a World Bank Group initiative. Why?

Since its early design phase in 2003, I contemplated to make the Convergence Program a well-established World Bank Group activity.

World Bank affiliation is important because authorities draw comfort from a governance framework whose design is overseen by World Bank staff. For the Bank, the SPI

Platform is a cost-effective “retail-level” implementation instrument of high-level policy reforms. It can also generate a reform program deserving financial support through a development policy loan. Finally it offers attractive short-term advisory engagement opportunities in a framework of strong local ownership and enactment focus.

An IFC affiliation is equally important for several reasons. IFC can help mobilize the local banking community behind the SPI Platform, as it is their trusted partner for financing support, capacity-building and help to improve its business environment. The Platform itself signals to IFC what are the reform priorities of the banking community with ex-ante endorsement from authorities; provides IFC with a well-organized project execution environment geared to maximum leverage of its international expertise; and offers unmatched strong enactment support to its advisory assignments. Finally, SPI Platform successes generate goodwill that could facilitate other IFC investment and advisory activities in the country. The current work with IFC South Asia to promote SPI Platforms in Bangladesh, Nepal and Sri Lanka offers interesting insights into the synergies between IFC Advisory and SPI Platform activities.

25. How do you see this work organized? And how much budget would it require?

First, it is important to realize that the Convergence Program BOT cycle comprises three distinct phases: 1) promotion and launch; 2) operations; 3) transfer to local ownership. The first and third phase should be run by a central team. The second phase, which is operationally more intensive, should be run by IFC regional advisory facilities. To have a meaningful impact both on client countries and on the World Bank Group activities, the Convergence Program should target to have between fifteen and twenty SPI Platforms up and running in at least three regions²⁰ over a three-year period – with about ten under active support at any point in time. Let me explain how to secure this objective. A small team of three seasoned professionals, with adequate office support, would be sufficient to lead this effort. It is conceivable that a senior professional could be responsible to promote and launch two-three SPI Platforms a year – about eight over a three-year period (and guide their transfer to local ownership at the end of the BOT cycle). This team would require an annual budget of about \$1.5 million. This would be the only incremental budget required to scale up the Convergence Program activities.

IFC regional advisory facilities, with light support from the central team, would be responsible for the operations support phase, which starts when the Secretariat team has been hired and ends with transfer of management support responsibility to local stakeholders (as presently done with IFC SEDF in South Asia). Depending on management arrangements, a regional facility dedicated staff could support two SPI Platforms. Regional facilities would be required to absorb the cost of providing management support to the SPI Platforms, including paying for SPI Secretariat staff for two years. This phase requires an up to \$0.5 million budget over two-years. Each SPI Platform would complete about ten reform projects annually with an aggregate \$200 million first-year RIA economic value. Average project cost is \$25 thousand.

²⁰ Initial targets could be Europe, Middle East and North Africa, South Asia and Sub-Saharan Africa.

The operational leverage created by this structure is significant: about two thousand public-private financial sector experts in client countries would be mobilized by the SPI Program team of about ten IFC regional facilities staff coordinated by the three-staff central team.

26. What would be your first steps in managing a scaled up Convergence Program?

First of all, I would strengthen my present team with staff with IFC regional advisory and public-private dialogue experiences to meet SPI Platform design and operational needs²¹.

I would establish strong links with WB and IFC Country Managers as well as Financial Sector and Regional Facility Managers to identify the countries where conditions are favorable to launch an SPI Platform to meet country needs and support Access to Finance, Business Enabling Environment and other Advisory Services, downstream from WB policy work. The experience with IFC SEDF will be an important benchmark.

In parallel, I would build strong external partnerships to ensure that other public and private institutions can participate in this effort to “wire” developing countries with stronger capacity to deal with financial and business environment modernization issues. The agenda is so large that we need to mobilize many other partners to achieve this goal. Part of the performance metrics of the Convergence Program should also cover the number of SPI Platforms supported (and perhaps even sponsored) by other institutions.

27. Could you describe what is that you would do in a new SPI client country?

Based on the SPI target list prepared in consultation with relevant WB and IFC Country and Product Managers, the team will set out to receive a mandate²², jointly from financial authorities and relevant market participant associations, to help establish a public-private partnership in one particular country.

Hiring and training the SPI Secretariat sets the work in motion. The team will help the SPI Secretariat run extensive consultations to prepare a financial modernization program for approval by the high-level SPI Committee.

The program will consist of ten to twelve projects, suggested by both authorities and market participants, which will have a concrete impact on addressing market failures. It is important to select topics that do not have outstanding policy issues and that can lead to prompt enactment after completion of its analytical due diligence.

As I have indicated when I was describing the Romania and Albania experience, the resolution work will be done by the local working groups with analytical support from the SPI Secretariat, backed up by the IFC Regional Facility staff.

²¹ It is outside the scope of this note to suggest that this team could also support the twenty or so public-private dialogue platforms supporting Business Enabling Environment work.

²² An IFC SmartLessons “[Building a sustainable country platform for financial sector modernization](#)” gives details on how to launch an SPI Platform.

As the IFC Regional staff SPI coaching mandate draws to an end, the central team will support the SPI Platform transition to local operational and financial responsibility.

28. Let us go back to the budget. Adding the expenses of the core team to those incurred by the regional facilities, the total budget amounts to \$12 million over 3 years. How could you justify it?

The numbers to compare are cost and benefits of the program. With the latter being \$3 billion in aggregate, the actual cost is a mere 0.4% of the benefits.

The additional costs to justify are those of the core team. The budget engaged by the regional facilities represents a different and very cost-efficient modality to fulfill their mandate – with a particularly low average project cost.

Actually, one should see the \$4.5 million spent on the core team as an “investment” in a project management infrastructure that will deliver future cost efficiencies.

29. Could you please elaborate on this concept of treating an advisory expense as an investment? Can you calculate a NPV? An IRR?

As indicated earlier, the average SPI project full cost is \$25 thousand. The cost for external consultants, when hired, is about \$10 thousand (based on SPI Romania experience). This is because the project working group structure allows very accurate targeting of external assistance to the actual knowledge gaps.

Assuming each of the 15 SPI Platforms will require WBG assistance on three projects per year, the total WBG annual budget savings would amount to some \$1.8 million²³ to achieve the same developmental impact (assuming conservatively that WBG will not be able to provide any advisory services to SPI Platforms for a fee).

All in all, the \$4.5 million investment in the SPI Platform Program can generate a net gain on a NPV basis of some \$8.0 million over a 10-year period. IRR is in excess of 50%.

30. How does the World Bank Group interface with the local institution created by the Convergence Program? Is its work going to be made any easier?

This is an important matter. Since the launch of the SPI Platform, World Bank Group presence and role must be consistent with the desired end-result, if the local community is going eventually to take full financial and operational responsibility for the SPI Platform. In other words, the SPI Platform must be positioned as a local institution with temporary Convergence Program management and methodological support.

Of course, the essence of the SPI Platform is to create a web of partnerships with domestic institutions and international donors. The Convergence Program has always supported the SPI Secretariat to connect with the donor community, both locally and with their HQs (particularly with the WBG).

²³ Assuming a \$50 thousand/project for direct advisory interventions.

It is also important to note that the Convergence Program, and least the World Bank, does not take responsibility for the content of the final recommendations prepared by project working groups. As mentioned earlier, the SPI Platform has an elaborate and codified system of peer review and quality control within the project working group structure, through project management team clearance and final SPI Committee endorsement. The Convergence Program role is to support the SPI Secretariat to prepare good analytical reports and let the project management team direct the conclusions where project working consensus leads.

World Bank Group investment and advisory activities will obviously benefit from the presence of a robust domestic institution that would process a large scale modernization program and support other operational needs. An excellent example is the collaboration with IFC to strengthen Romania's credit bureau operations with the addition of positive credit information sharing²⁴.

31. Could other public or private institutions sponsor SPI Platforms?

While the undertaking of the SPI Platform initiative probably could never have happened without initial World Bank involvement, its quick success and modest budget requirements make it an instrument that other institutions could sponsor. This is important because it suggests the potential for bigger and faster impact for this World Bank Group initiative by working through partnerships.

For instance, the European Banking Federation has started engaging with the European Commission to explore the possibility to jointly sponsor SPI Platforms in Eastern Europe, drawing on the methodology and systems set up by the Convergence Program.

The recent launch of the International Centre for Financial Regulation, a public-private think based in London, suggests a potential partnership to promote the Better Regulation agenda in developing and emerging countries.

Regional International Financial Institutions or strong bilateral donors (e.g., DFiD) could sponsor the establishment of SPI Platforms. USAID gave indications that the SPI Platform could be an attractive institution to support as they unwind their country programs. It is also conceivable that professional consultants (e.g., McKinsey²⁵) could be support SPI Platforms in more advanced emerging countries that are used to hiring and paying for external expertise.

I wish to note, however, that EBRD has shown reluctance to play a more active role in co-managing the Program²⁶, as initially requested by the Convergence Program donor. Their concept of advisory services is strongly linked to their own investment activity

²⁴ Details: <http://www.spi-romania.eu/program-2007/expansion-of-positive-credit-information-sharing/>

²⁵ McKinsey Quarterly has recently published an [article](#) on how to structure constructive engagement between corporations and regulators.

²⁶ Collaboration with EBRD otherwise has been excellent: they participated in the management group meetings in 2005-2006 and co-managed the Croatia securitization project (together with Germany's KfW).

needs. But they also seem uncomfortable with the concept of supporting a central multi-project Secretariat, despite its large cost-efficiencies. They prefer a project-by-project approach, probably reflecting donors' concerns on effectiveness and governance of more complex (and in-principle more efficient) program management structures²⁷.

Once a critical mass of SPI Platforms is active, the need for outside catalytic intervention subsides. It is conceivable that authorities and market participants may agree to undertake a modernization program by creating a small joint secretariat and pooling their respective expertise in working groups without outside catalytic intervention. In some case they may appoint a professional service firm to operate the secretariat on their behalf. Informal soundings with Ernst & Young suggest that this may be possible for a limited period of time, even at no cost (as a business development investment).

32. Why should the World Bank Group cast this initiative as a public-private partnership? Can our work benefit from public-private collaboration?

A financial modernization initiative requires an execution modality through public-private cooperation.

The large number of issues involved in market efficiency, the need for specific technical knowledge, the focus on implementation practicalities and the overall energy required to implement a large ongoing reform program (it may consists of 15-30 projects) requires broad mobilization of local resources and expertise.

Absence of mobilization of local resources has a dramatic consequence on breadth and sustainability of reforms. International resources can only catalyze local initiative but can never durably replace it.

In turn, the World Bank Group interface with a viable local reform counterpart allows WBG resources to deliver on their comparative advantage: international experience of what works and what does not – leaving the implementation details to local experts. As shown in several instances, this allows very high leverage of scarce international expertise.

33. How do you characterize the World Bank Group's involvement in this initiative?

Unlike most World Bank Group activities that involve direct provision of advisory or technical assistance to public or private clients, this initiative for a better business environment for financial intermediation aims at catalyzing local stakeholders to start cooperating within a framework and with a methodology developed by the World Bank.

The World Bank Group is positioned as a facilitator of local capacity building, given its temporary support role to the local SPI Platform.

It is an innovative role that leverages the Bank Group's convening power and global expertise to enable client countries to become effective leaders in their own development

²⁷ Same concern seems to shape FIRST's initial assessment of the attractiveness to support an SPI Platform.

priorities in areas where the Bank Group does not have an established comparative advantage.

E. CONVERGENCE PROGRAM'S ORIGIN AND OPERATING PRINCIPLES

34. The Convergence Program's mandate is to promote public-private financial sector modernization in South-East Europe. Why did you start this Program?

I started thinking about this Program in mid 2002 when I discovered the regulatory projects of the Italian Banking Association (ABI). A new world beckoned: ABI engages with authorities on several hundreds of issues (and manages to resolve 60 to 80 of them annually) that mostly escape the attention of financial authorities in developing countries (and of their advisors such as the World Bank).

I immediately realized the potential for a large expansion of World Bank activities if reform programs could include issues proposed by market participants and consumers. Looking at the range and volume of regulatory advocacy activities pursued by ABI in its relatively sophisticated market (and at the many consultants and experts advising them), I got a sense that this market segment in our client countries would offer virtually unlimited engagement opportunities to the World Bank Group for many years to come – regardless of exceptional interventions needs such as those for the Asia crisis and Eastern Europe transition work.

35. But banking associations are not influential as their peers in advanced countries to create this reform agenda. So will this “advisory” market ever develop?

It is true that market participants are not active protagonist of financial sector reform in most developing countries.

The main problem is absence of an organized dialogue between financial authorities and market participants through which the latter can communicate reform priorities meeting market development needs to the former.

This absence of dialogue is a powerful deterrent to the build-up of analytical capacity in the private sector and civil society that would contribute ideas, analyses and possible solutions to market-based financial sector reform.

However, it is important to realize that market-based financial sector reform is not held back by lack of dialogue itself, but by two institutional constraints whose impact is exacerbated by lack of dialogue.

First, financial authorities have limited capacity to address reform needs other those related to core stability and prudential concerns. I will discuss the differences between these activities later. One major difference is that market development needs entail a large number of regulatory interventions, often coordinated amongst various institutions.

Second, financial authorities have scant knowledge of technicalities of banking products and services and the intricacies of banking organizational constraints. This affects their ability to appreciate the usefulness and impact of possible regulatory action – and also the quality of regulation if and when issued.

One does not need to be a visionary²⁸ to realize the powerful impact that a catalytic intervention could have to overcome institutional constraints that hold back market development through the creation of a governance framework under which public-private analytical capacity could be mobilized to process a large volume of regulatory changes.

The unmet demand for dialogue should not be exaggerated, though. Banks, which can be more comfortable in controlled market environments with limited innovation, are often satisfied with individual “lobbying” access to address specific business problems. But with foreign entry and financial sector liberalization, competitive forces are on the rise. Banks increasingly require, as observed in Eastern Europe, effective modes of collective representation, as bilateral “lobbying” is proving inadequate to address structural issues.

36. Why did you believe that a catalytic intervention could have been successful in creating this advisory market?

The catalytic intervention needs to show the win-win public-private benefits of adopting this procedure – and, above all, should be capable to deliver it in practice. Words are not sufficient. A further complication is the need to design a procedure that the local stakeholders will eventually be able to operate on their own, in the absence of the catalytic operator.

Authorities and market participants may be interested in this approach because of the large gains available to each of them. For the former, it means extending and improving the regulatory reach. For the latter, it means the ability to pursue additional business opportunities. For both of them, it means also getting to know each other objectives and incentives better. In no country can authorities neglect how the market operates and, conversely, market participants cannot lastingly disregard policy objectives and priorities in their pursuit of their business plans.

Regulatory design practices of sophisticated markets and the irrepressible diffusion of product innovations are real incentives for authorities and market participants in developing countries to find a workable procedure to address market development needs.

²⁸ The main hurdle in forming this vision is the lack of visibility of the activities and work methodologies of banking associations in sophisticated jurisdictions. The Convergence Program sponsored a comprehensive study of ABI’s activities (http://www.spi-romania.eu/admin/filemanager/files/abi_study_final_draft_18_1_2006_def1.pdf).

37. Why did you think that it was a legitimate World Bank mandate to undertake this catalytic intervention?

Financial intermediation inefficiencies arising from coordination failure between authorities and market participants (and among market participants themselves) have important economic and social consequences (mainly absence of, lack of access to and high cost of suitable financial products).

The “do-nothing” option that is, to leave authorities and market participants organize themselves overtime, did not give assurances of eventual success. The experience of the European Commission-led “Better Regulation” effort²⁹ was too recent to have become an internationally accepted best practice that countries would strive to adopt autonomously because of enlightened self-interest. Official intervention seemed therefore justified³⁰, also supported by statements of authoritative European financial policy makers³¹.

The centrality of financial sector development in the World Bank’s growth-enhancing and poverty reduction mandate justified its own intervention in this new segment. If successful, the World Bank intervention would have had a global pay-off in terms of demonstrating the feasibility to promote a new institution that can sustainably process a market efficiency reform agenda left unattended because of a coordination failure³².

38. How did you define the boundaries of the World Bank’s intervention?

The internal skepticism that I faced as I was designing the Program prompted me to define the World Bank’s intervention very carefully. First, I abandoned the initial intention to support the strengthening of banking associations, shifting the focus to building the interface between banking associations and authorities. Second, I operated under a new brand name, Convergence Program, that signaled a somewhat arms’ length relationship to the World Bank. Third, I built the initial core team around former senior central bankers that had undisputed professional visibility and recognition in the region. Fourth, I defined World Bank operational involvement as time-bound, with the necessity to quickly reach local sustainability as a key success factor of the Program.

²⁹ Regulatory interventions by the European Commission and EU financial regulators follow a well-defined protocol of market failure analysis, comparison of policy options in open consultation with affected stakeholders (http://ec.europa.eu/civil_society/consultation_standards/index_en.htm).

³⁰ “Convergence-A World Bank Draft Proposal”, Slide 17, March 2003 (http://www.spi-romania.eu/admin/filemanager/files/spilibrary/convergence_consultations.pdf)

³¹ *“It is crucial to be aware that market-led progress requires cooperation among economic (public and private) agents. We cannot be blind to the fact that the necessary cooperation among private market participants does not materialize unless public authority play an important role in promoting it.”*, Tommaso Padoa-Schioppa, former ECB Executive Board Member

³² However important this intervention could have been, its prospects of success did not seem high, as witnessed by the difficulty to secure operational and funding support outside World Bank and Italy.

39. Why did it take you so long to move from identification of the opportunity in late 2002, as you said, to program launch which happened only in mid-2005?

In response to the feedback received in the first internal review meeting in spring 2003, I decided to continue to explore the feasibility of the approach with broad consultations and public speaking engagements. This careful sounding period took another year. A further delay was caused by the donor's legitimate request to involve European Commission and EBRD in the project. All in all, a two-year gestation period was really necessary to understand the complexity of the situation and the need for a very disciplined and structured approach.

In retrospect, this careful planning was a major factor in the Program's quick success after its launch -- without major setbacks. And it allowed the Program to proceed at record speed in its implementation: 1) nine months from beginning of the analytics to law enactment in the first pilot project; 2) six months to launch SPI Romania; 3) twelve months from floating SPI Albania concept to first law enacted.

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