



Course IV:

DeFi Risks and Opportunities

4. Regulatory and Environmental Risk

(ii) CBDC Competition

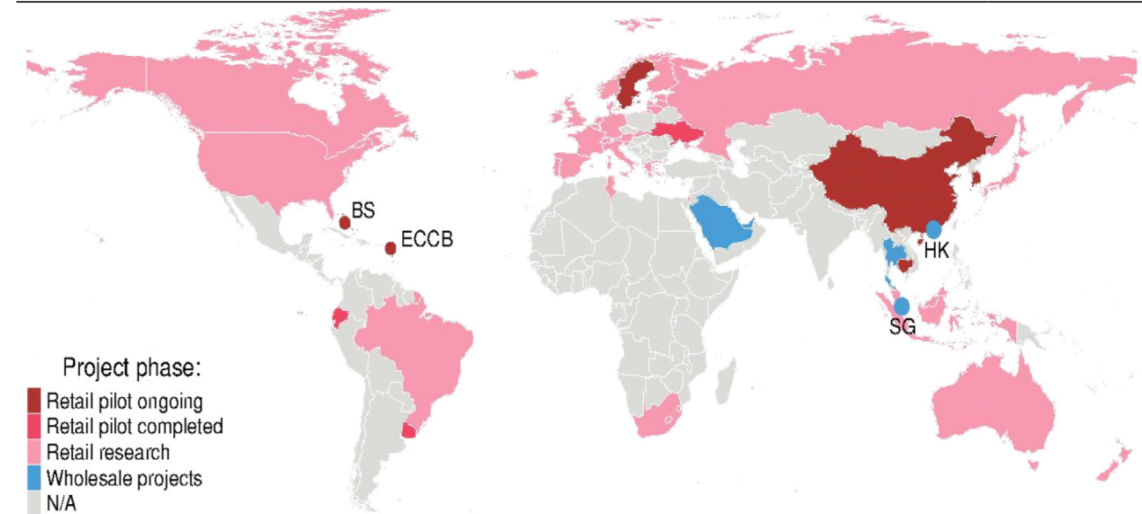
Risks: Regulatory risk: CBDC

Basics

- Digital form of a fiat currency
- Not a cryptocurrency running on a public, permissionless network
- Not a new concept – first proposed in 1987 by James Tobin
- Many countries in R&D phase and some (China, Sweden) in pilots.
Digital Euro to be announced in late 2021 by the ECB

CBDC projects status

Graph 3

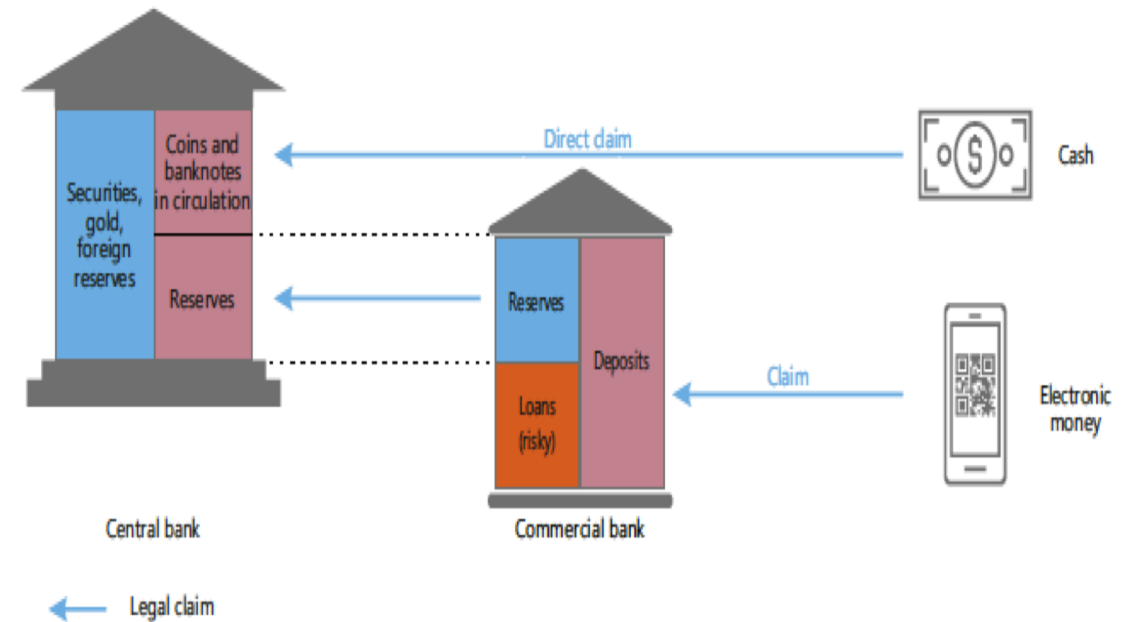


BS = The Bahamas; ECCB = Eastern Caribbean central bank; HK = Hong Kong SAR; SG = Singapore.

Risks: Regulatory risk: CBDC

Types of Money Today

- Cash is a direct claim on a central bank. Holders are fully guaranteed by the central bank
- Central Bank reserves are accessible only to institutions who have accounts with the Federal Reserve
- Commercial Bank Money (Electronic money) accounts for most of the money in circulation. This is a claim on a commercial bank, who may not insure the full amount of the holder's deposits.



Risks: Regulatory risk: CBDC

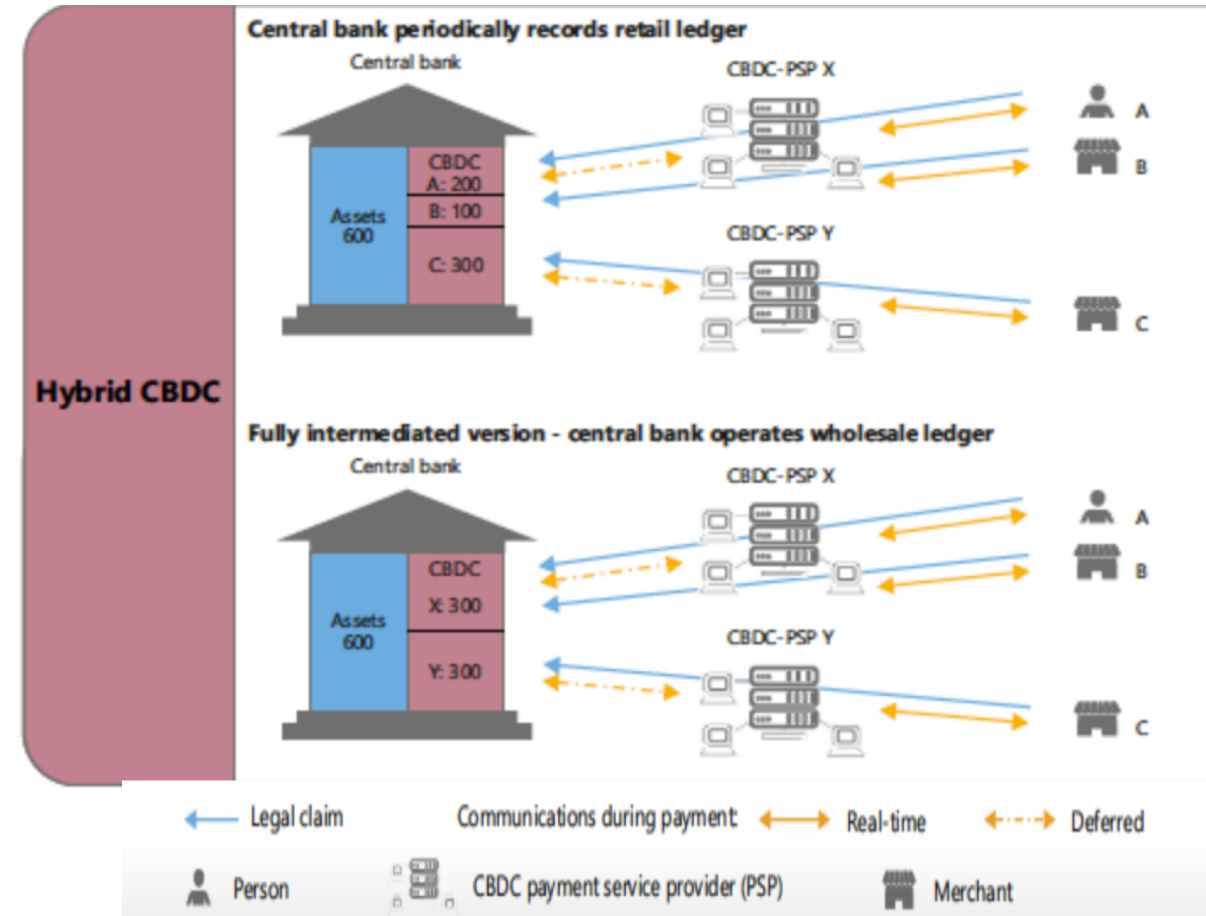
Overview

- Holder of a CBDC has a direct claim on the central bank
 - Central Bank guarantees at par convertibility
- There are several design choices for a CBDC, spanning from architecture, infrastructure, access, and interoperability
- Retail vs Wholesale CBDC
 - Wholesale – limited to commercial banks
 - Retail – includes corporations, small businesses, and individuals

Risks: Regulatory risk: CBDC Architecture

Hybrid CBDC

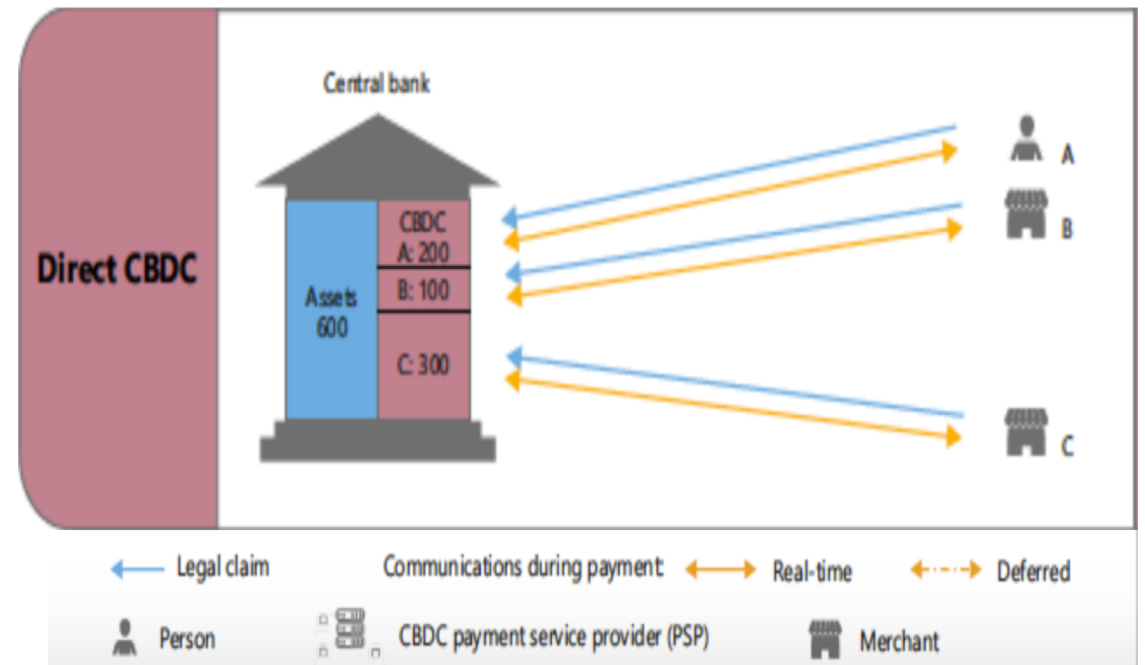
- Commercial Banks onboard users, handle compliance (KYC/AML), and manage accounts. 100% of cash deposits at a commercial bank backed at CB
- Central banks ultimately settle transfers and periodically record retail balances



Risks: Regulatory risk: CBDC Architecture

Direct CBDC

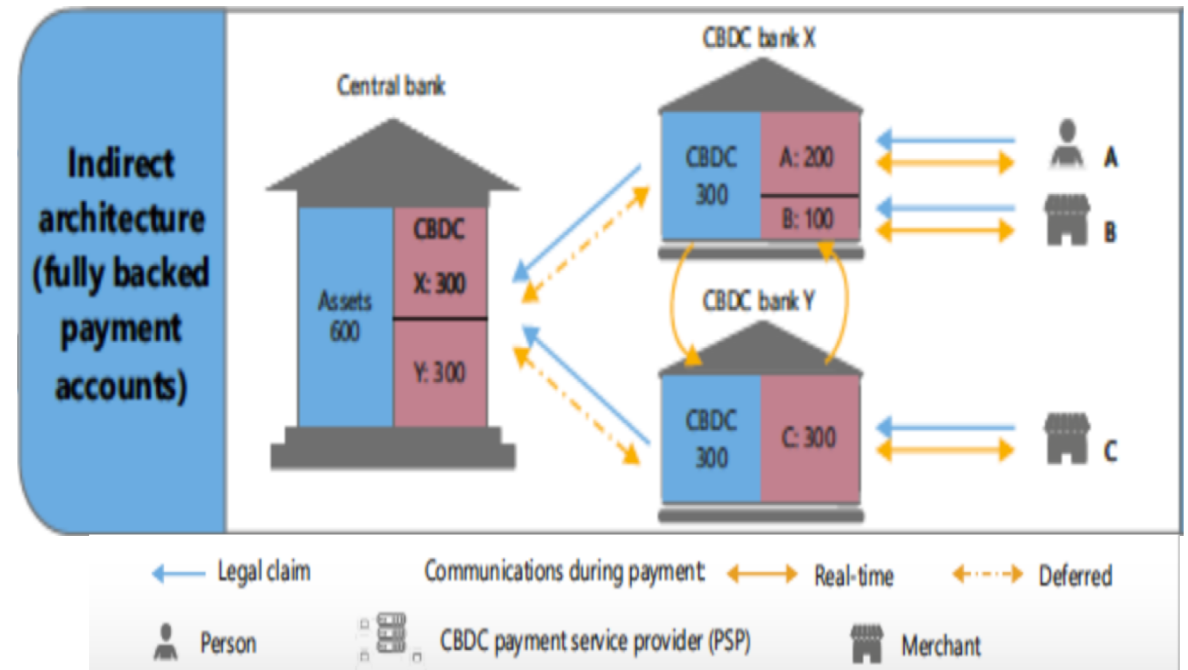
- Central bank directly operates retail system, offers retail services, and maintains all transactions
- Direct CBDC's fully disintermediate commercial banks



Risks: Regulatory risk: CBDC Architecture

Indirect CBDC

- Unlike in Hybrid/Direct CBDC Architectures, the user's digital currency is not a direct claim on a central bank
- CB tracks only wholesale accounts. In other architectures, the CB can track both wholesale and retail accounts



Risks: Regulatory risk: CBDC Design

Ledgers

- Ledger are centralized (Direct Architecture) or shared among CBs and intermediaries (Hybrid/Indirect Architecture)
 - Either on a centralized database or DLT
- Public, permissionless distributed systems are not being heavily explored due to a lack of centralized control

Risks: Regulatory risk: CBDC Architecture

Accounts

- Account-based access: State is recorded as a list of accounts each with its own balance. Tied to a payer's identity
- Token-Based access: State is recorded as a list of assets, each of which has a corresponding holder
 - Token-Based accounts do not necessarily provide anonymity. Compliance with KYC/AML is still required

Risks: Regulatory risk: CBDC monetary policy

- Strengthen monetary policy transmission channels
 - Pass through of interest rates would be more direct
- Efficient transmission of stimulus money payments to citizens
 - During Covid-19, over \$1.3 billion was sent to 1 million deceased individuals
- Enforce Negative Interest Rates
 - People can currently hold cash and avoid negative interest rates
 - Interest bearing CBDC's in combination with eliminating physical cash or removing large-denomination notes allow interest rates to go below 0

Risks: Regulatory risk: CBDC motivations

- Cryptocurrencies such as Diem (formerly known as Libra) and JP Morgan's Stablecoin (JPM coin) as well as many other cryptocurrency initiatives could be a threat to monetary sovereignty
- Cash-based payments continue to decline
 - Covid-19 only accelerates this, with fears of transmission through ATMs and physical cash
- Decreases the risk of bank runs in times of crisis

Risks: Regulatory risk: CBDC motivations

- Cross Border Payments
 - CBs can offer each other CBDC accounts denominated in respective currencies
 - Universal CBDC can be used to move between jurisdictions
- Potentially promote financial inclusion
 - CBs can offer low to no fee accounts to underbanked households
- Reduces the number of illegal transactions
- Efficient collection of VAT and BAT

Risks: Regulatory risk: CBDC downsides

- Disintermediation of Commercial Banks?
 - CB directly providing interest bearing accounts and a large scale transfer of deposits could shrink commercial banks' balance sheets
- Privacy
 - Cash provides a level of anonymity that CBDCs may not guarantee
 - CBs must balance between having enough supervision to enforce truly illegal activity and potentially giving enough oversight to intermediaries to give some privacy
- Is it too late?
 - CBDC a reaction to growth of cryptos. The horse has already left the barn.