Warning of the European Systemic Risk Board of 27 June 2019 on medium-term vulnerabilities in the residential real estate sector in France (ESRB/2019/12)

Dear Mr Le Maire,

This is to inform you that on 27 June 2019, the General Board of the European Systemic Risk Board (ESRB) adopted Warning of the European Systemic Risk Board of 27 June 2019 on medium-term vulnerabilities in the residential real estate sector in France (hereinafter "Recommendation ESRB/2019/12"). The General Board of the ESRB also adopted four other country-specific ESRB Warnings, addressed to four other Member States in which vulnerabilities relating to the residential real estate sector as a source of systemic risk have also been newly identified as not being sufficiently addressed. Furthermore, on the same date, the General Board of the ESRB adopted country-specific ESRB Recommendations to six Member States that received country-specific ESRB Warnings in 2016 on medium-term vulnerabilities in their respective residential real estate sector, and in which vulnerabilities relating to the residential real estate sector as a source of systemic risk are still not being sufficiently addressed.

Vulnerabilities relating to the residential real estate can be a source of systemic risk and may affect financial stability both directly and indirectly. In 2016, the ESRB conducted a Union-wide assessment of the vulnerabilities relating to residential real estate\(^1\). This assessment enabled the ESRB to identify a number of medium-term vulnerabilities in several countries as sources of systemic risk to financial stability, which led to the issuance of warnings to eight countries: Belgium\(^2\), Denmark\(^3\), Luxembourg\(^4\), the Netherlands\(^5\), Austria\(^6\), Finland\(^7\), Sweden\(^8\) and the United Kingdom\(^9\).

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The ESRB has recently concluded a systematic and forward-looking European Economic Area (EEA)-wide assessment of vulnerabilities relating to residential real estate. As a result of this assessment, the ESRB has identified certain medium-term vulnerabilities in the residential real estate sector in France as a source of systemic risk to financial stability, that have not been sufficiently addressed and which may have the potential to create serious negative consequences for the real economy. From a macroprudential perspective, the ESRB considers the main vulnerabilities to be high and increasing household indebtedness associated with a recent deterioration in lending standards.

The General Board of the ESRB, having assessed the results of the risk and policy analyses carried out, has concluded that the current policy measures that are in place or available in France are partially appropriate and partially sufficient to mitigate the identified systemic risks related to vulnerabilities in the residential real estate sector in France. For this reason, the General Board of the ESRB decided to issue a Warning to France on medium-term vulnerabilities in its residential real estate sector.

In line with Article 18(2) of Regulation (EU) No 1092/2010, I would hereby like to inform you that Warning ESRB/2019/12 will be published on the ESRB’s website and later in the Official Journal of the European Union. In addition, in line with Article 18(3) of Regulation (EU) No 1092/2010, addressees of public warnings have the right to make public their views and reasoning on the matter. Should you wish to utilise this right, you are kindly invited to submit to the ESRB Secretariat any views and reasoning that you may have on the matter by 9 September 2019.

The ESRB intends to monitor the risks identified in Warning ESRB/2019/12 and invites France to provide information, within one year from the publication of Warning ESRB/2010/12 in the Official Journal of the European Union, on the evolution of the vulnerabilities identified and on any policy measures that may have been taken in France in order to address these vulnerabilities. In this regard, the current capital-based macroprudential measures in place could be complemented by other measures to tackle the vulnerabilities related to increasing household indebtedness and to the signs of deteriorating lending standards. The ESRB acknowledges the efforts made by the French authorities to monitor risks in the residential real estate sector as well as their aim to further improve the monitoring framework in accordance with Recommendation ESRB/2016/14 of the European Systemic Risk Board. Notwithstanding this, further actions may be needed.

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to address the vulnerabilities identified in France. In particular, given the rising household indebtedness and signs of deteriorating lending standards, the national authorities in France could consider the need for additional pre-emptive actions such as explicit guidelines for lending standards, in the form of either a recommendation or formal borrower-based measures.

Furthermore, when activating any measures to address the identified vulnerabilities, their calibration and phasing-in should take into account the position of France in the economic and financial cycles, and potential implications as regards the associated costs and benefits.

Please also note that the following reports, adopted by the ESRB on 27 June 2019, will be made available electronically:

- “Methodologies for the assessment of real estate vulnerabilities and macroprudential policies – residential real estate”; and
- “Vulnerabilities in the residential real estate sectors of the EEA countries”.

Yours sincerely,

Francesco Mazzaferr

Head of the ESRB Secretariat

Enclosed:

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