

Stablecoin Risk

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Discussion by

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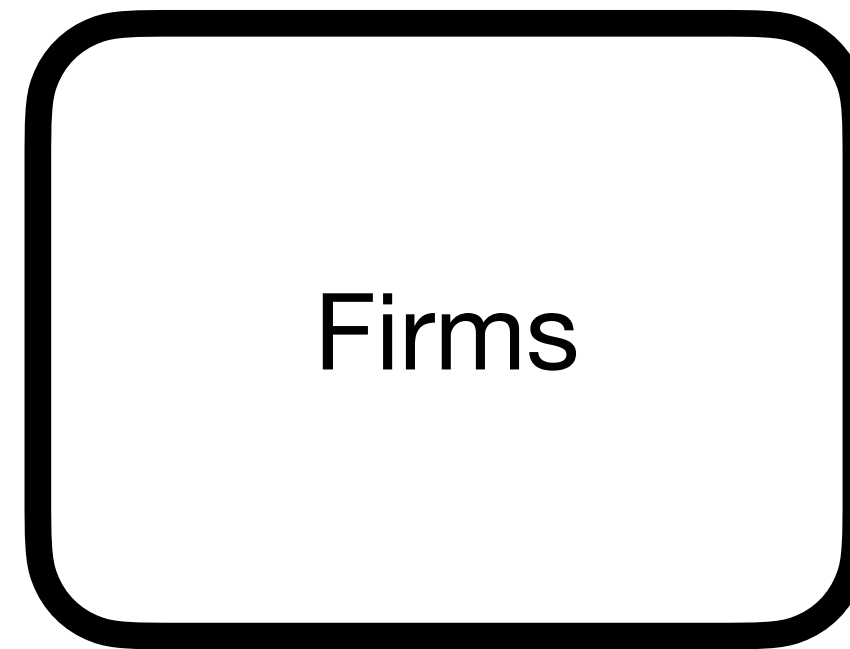
Central Bank of Ireland-Riksbank-DNB-Bundesbank

10th annual macroprudential conference

What the paper does

- Stablecoins are new means to pay
- ... which compete with bank's deposits... and can shift lending to NBFIs
- We shouldn't care if there are no frictions (Modigliani-Miller irrelevance result)
- ... but banks are useful because there are (information) frictions
there are good reasons to think SC will affect equilibrium allocation

What the paper does



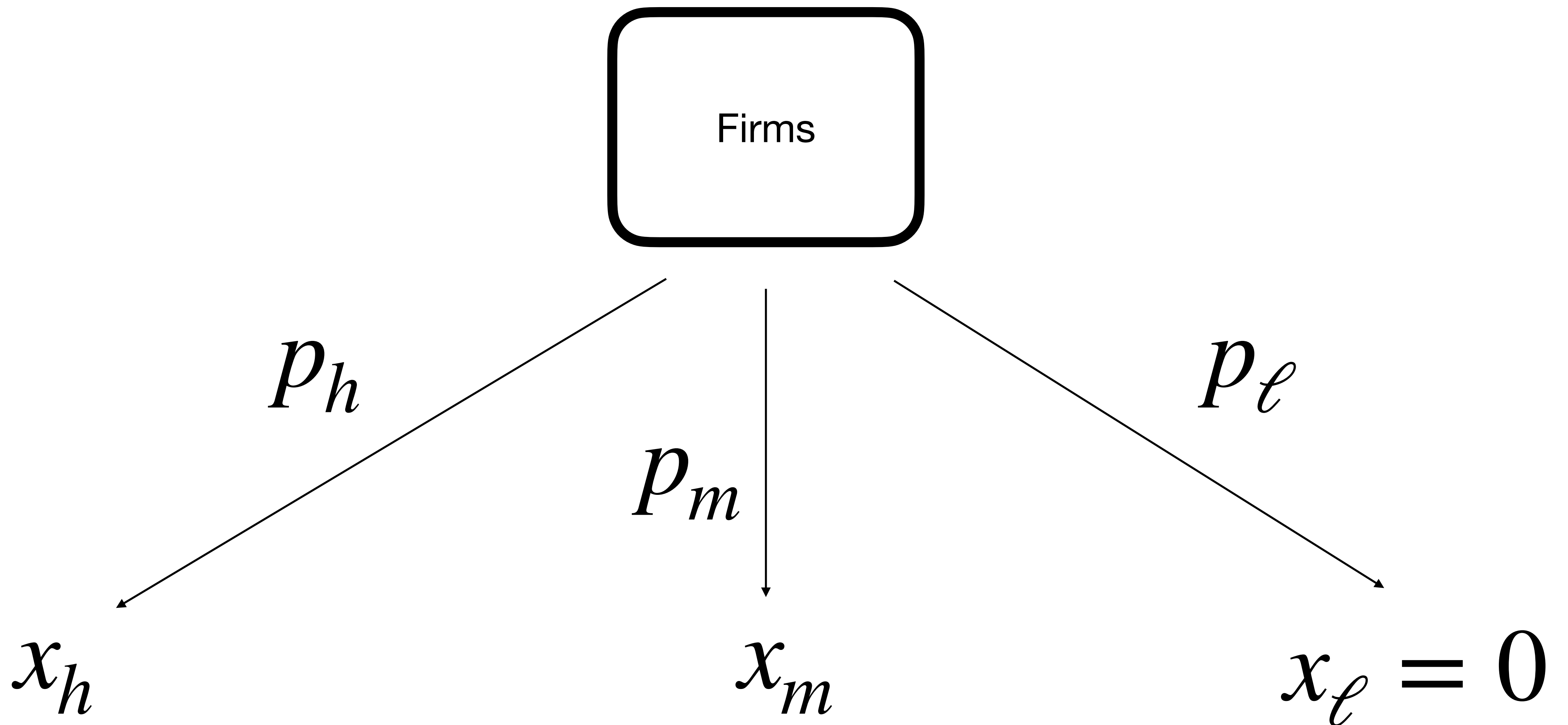
cash flows

$$x_h$$

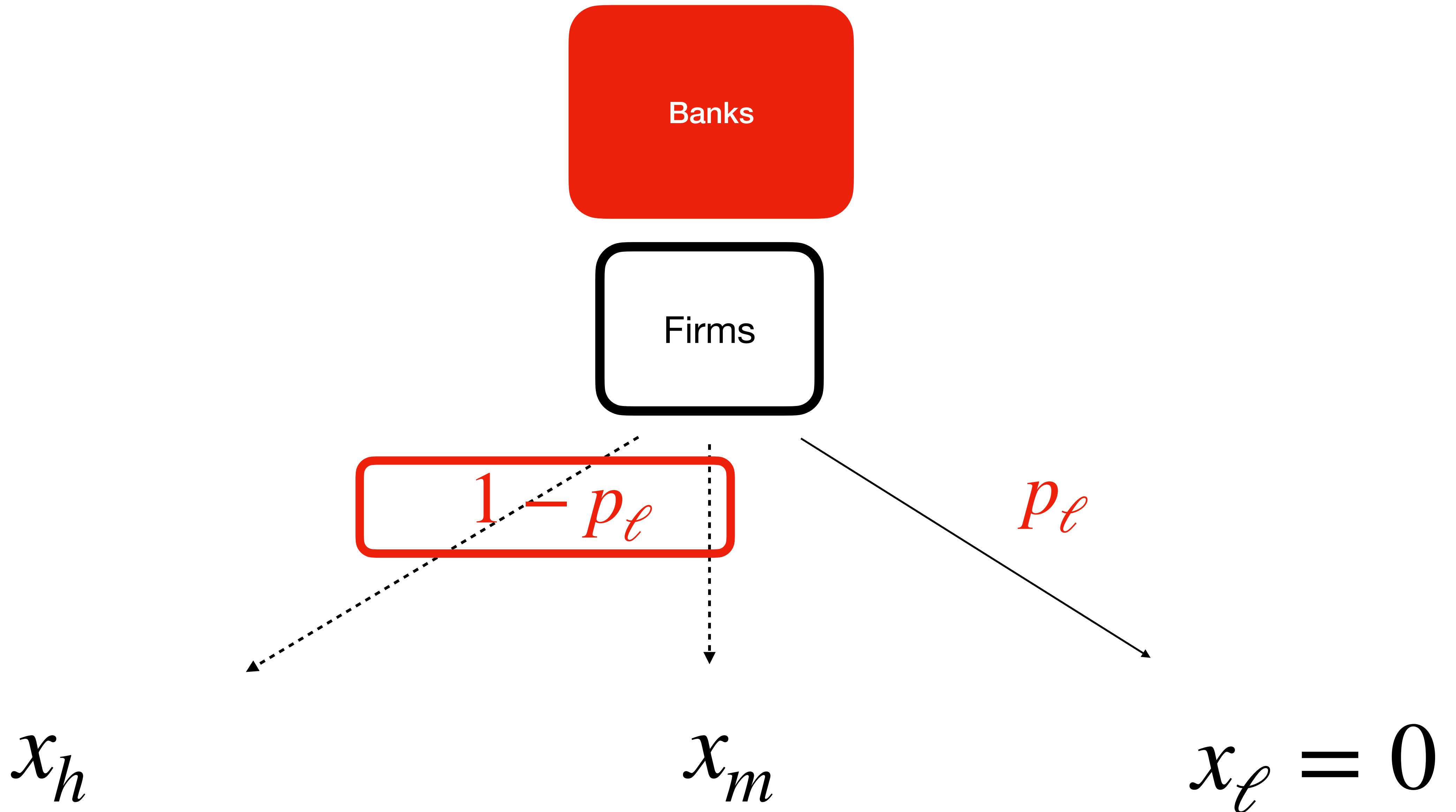
$$x_m$$

$$x_\ell = 0$$

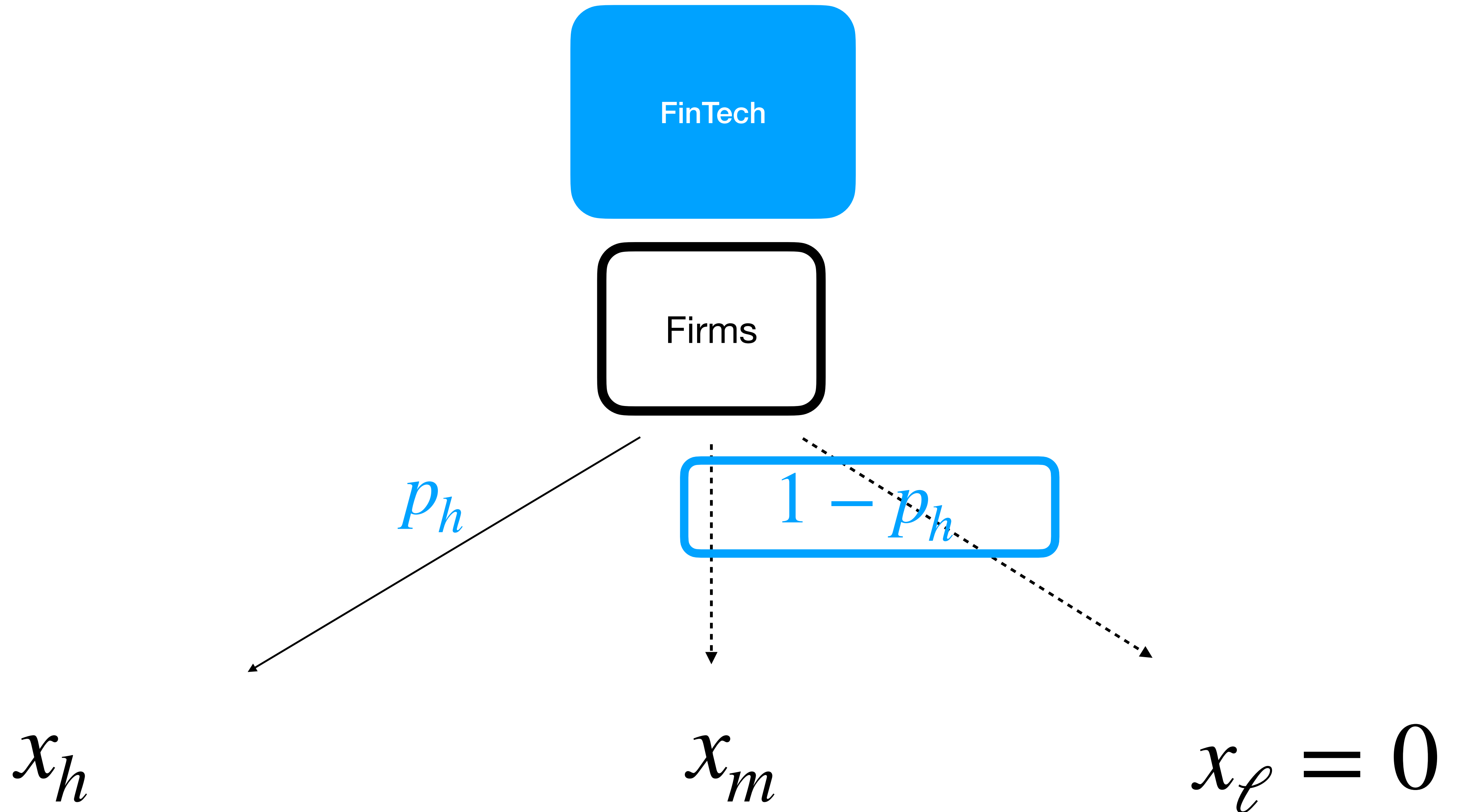
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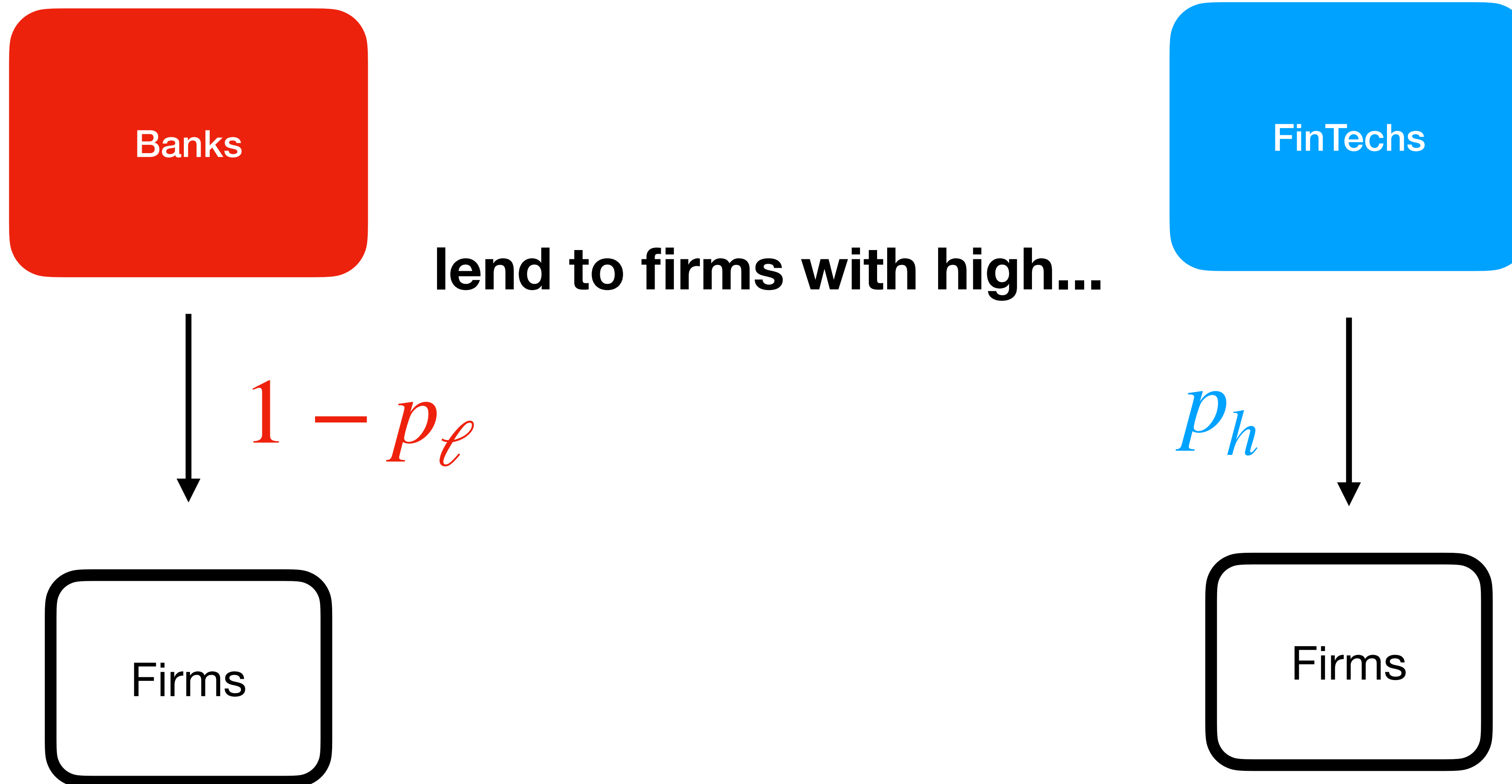
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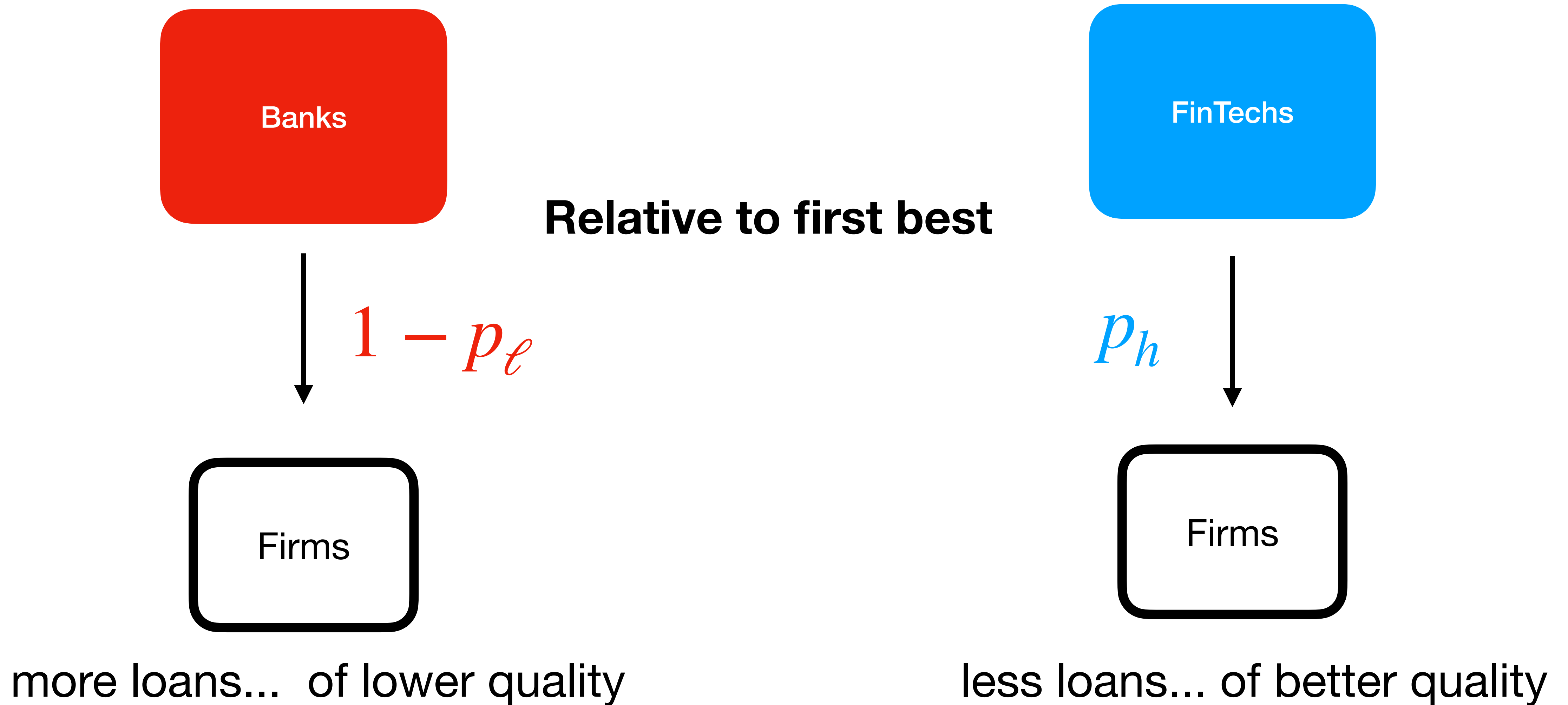
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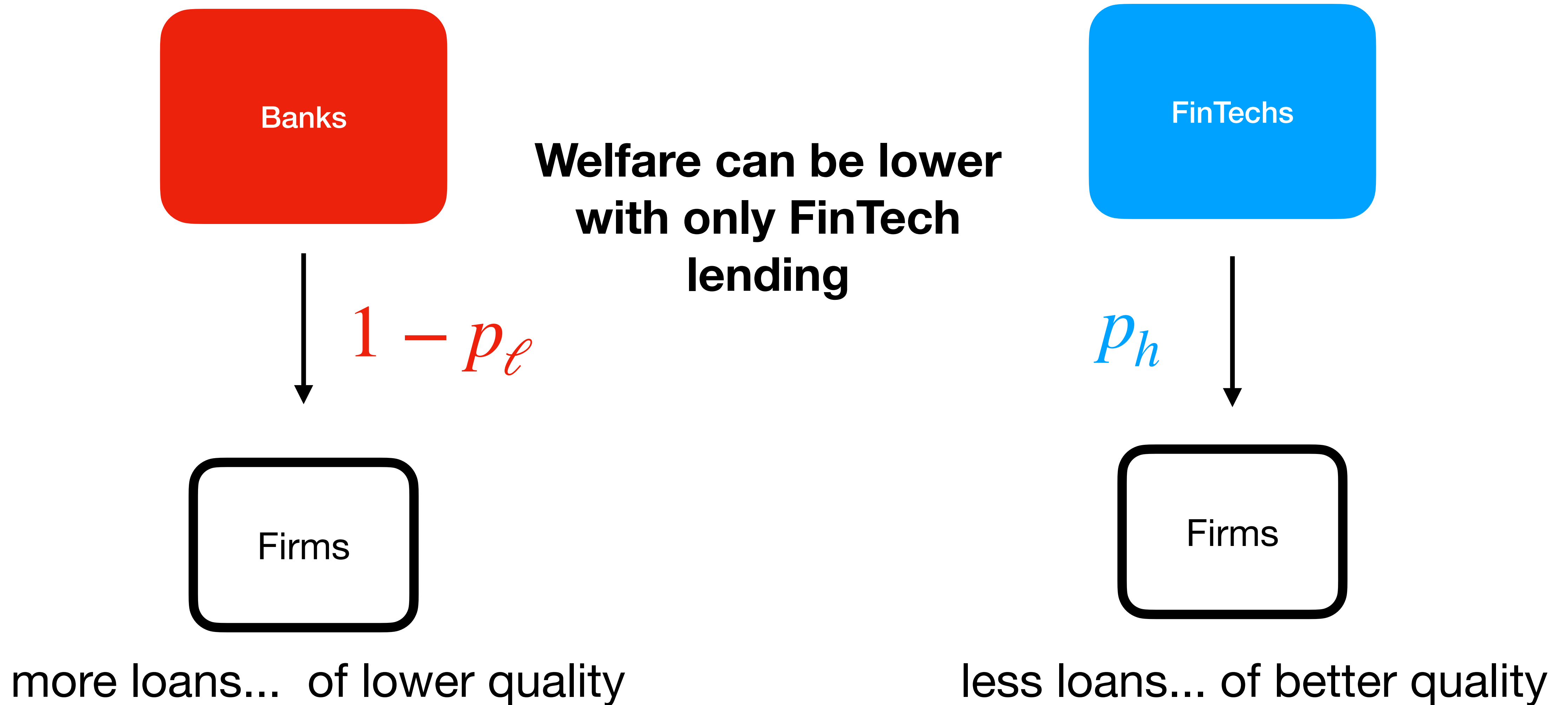
What the paper does



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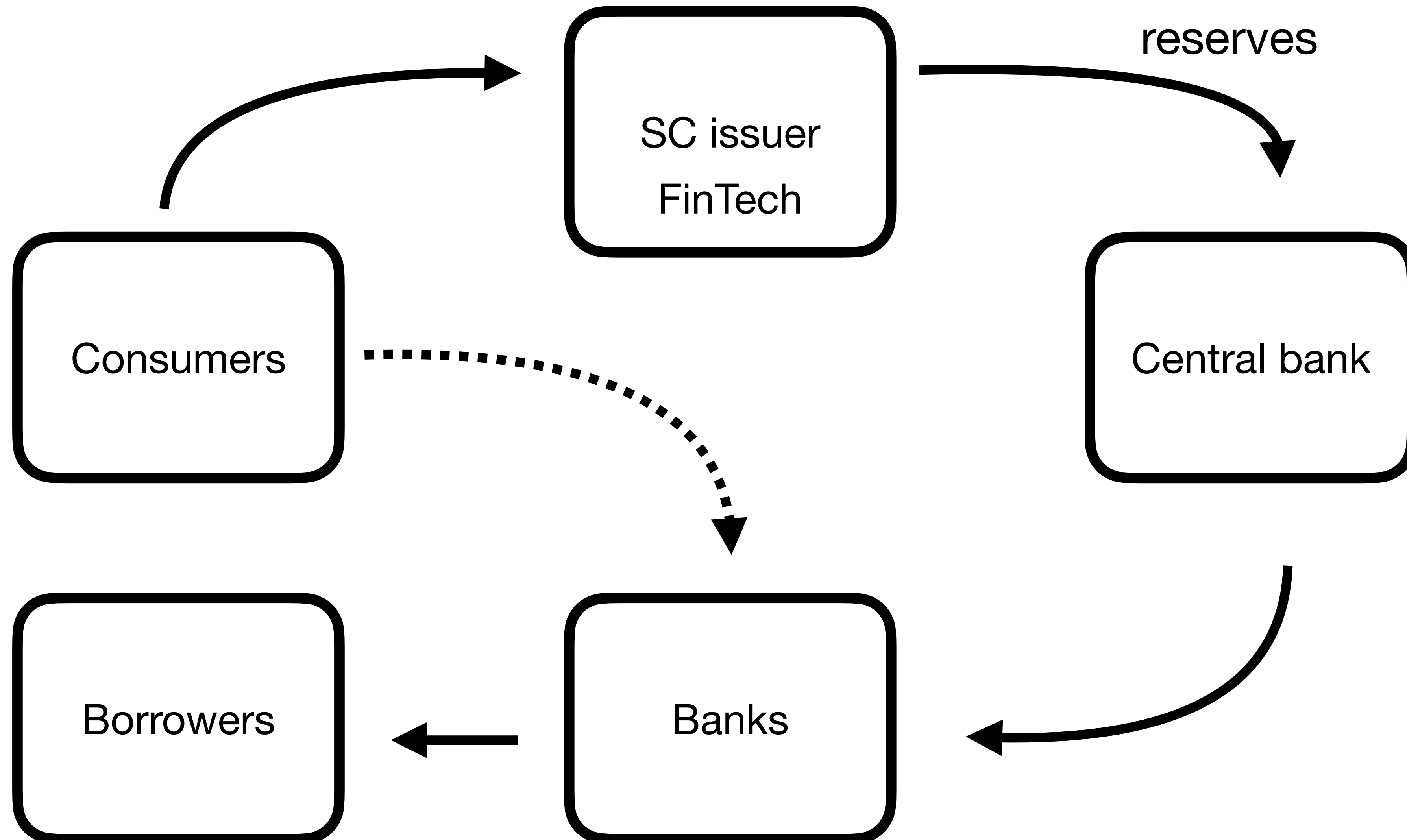


Comment 1 : payments or screening technology?

- The rise of non-bank lending to firms predates stablecoins. Is this about payments, or about competing screening technologies?
- To sharpen the over-/under-investment result → add venue choice for borrowers → self-selection into banks vs. FinTech
- Related: digital payments preserving privacy can erode banks' informational rents — but too much privacy shifts the rent to borrowers and can choke off lending (Ahnert et al. 2025)

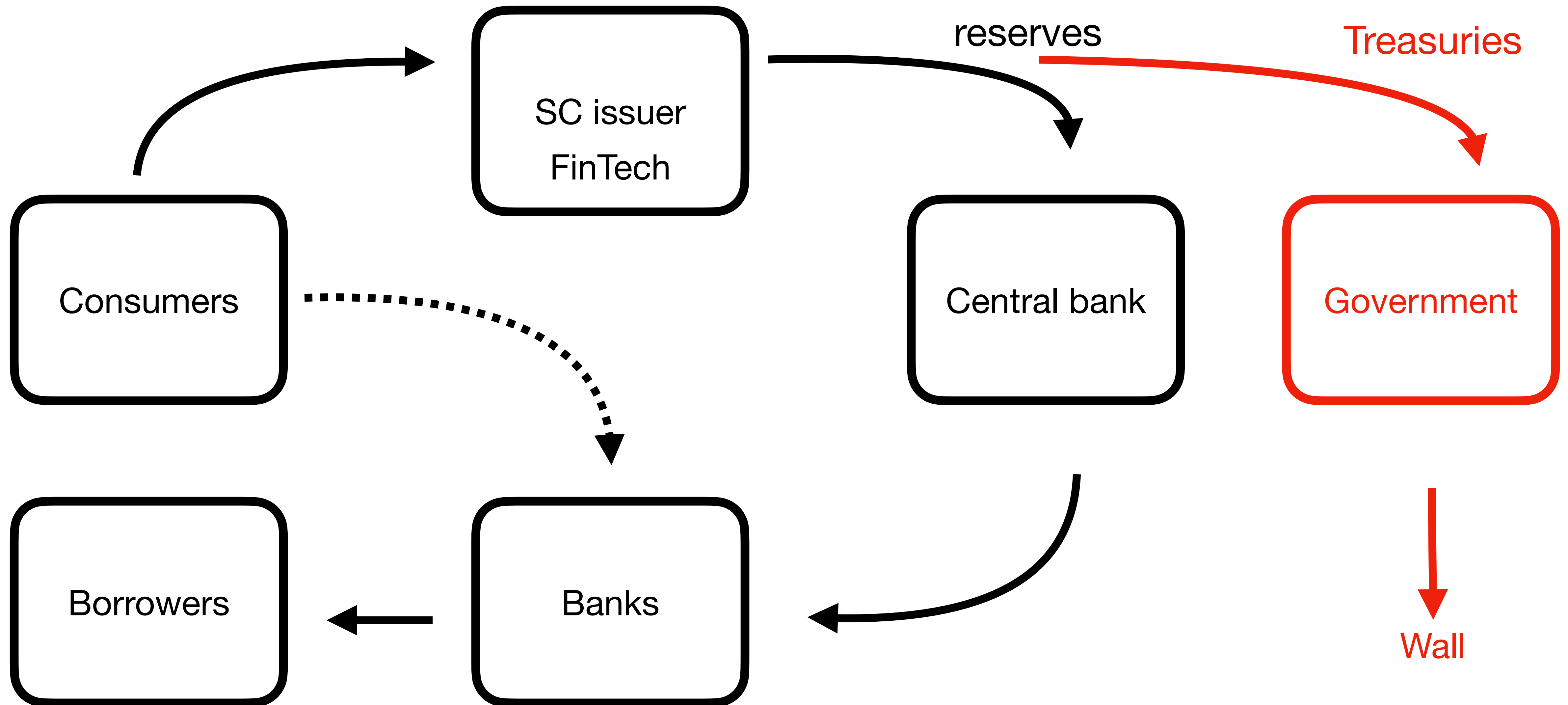
Comment 2: Macro Modigliani Miller

Different from Brunnermeier-Niepelt (2019) -- MMM for CBDC



Comment 2

Different from Brunnermeier-Niepelt (2019) -- MMM for CBDC



Comment 3: distinct stablecoin risks

- **Risk 1:** regulatory competition on compliance
- **Risk 2:** financial stability spillovers

Risk 1: Reg competition on compliance (Chiu et al. 2026)

- SC: a new X-border payments rail competing with correspondent banking...
- Countries compete for the global acceptance of "their" stablecoins
- ... → race to the (compliance) bottom

Risk 2: Financial Stability (Genius Act vs EU MiCA)

Deposits at banks



MiCA

> 60% of funds are held at EU credit institutions,
for significant issuers

Redemption on demand by all SC holders

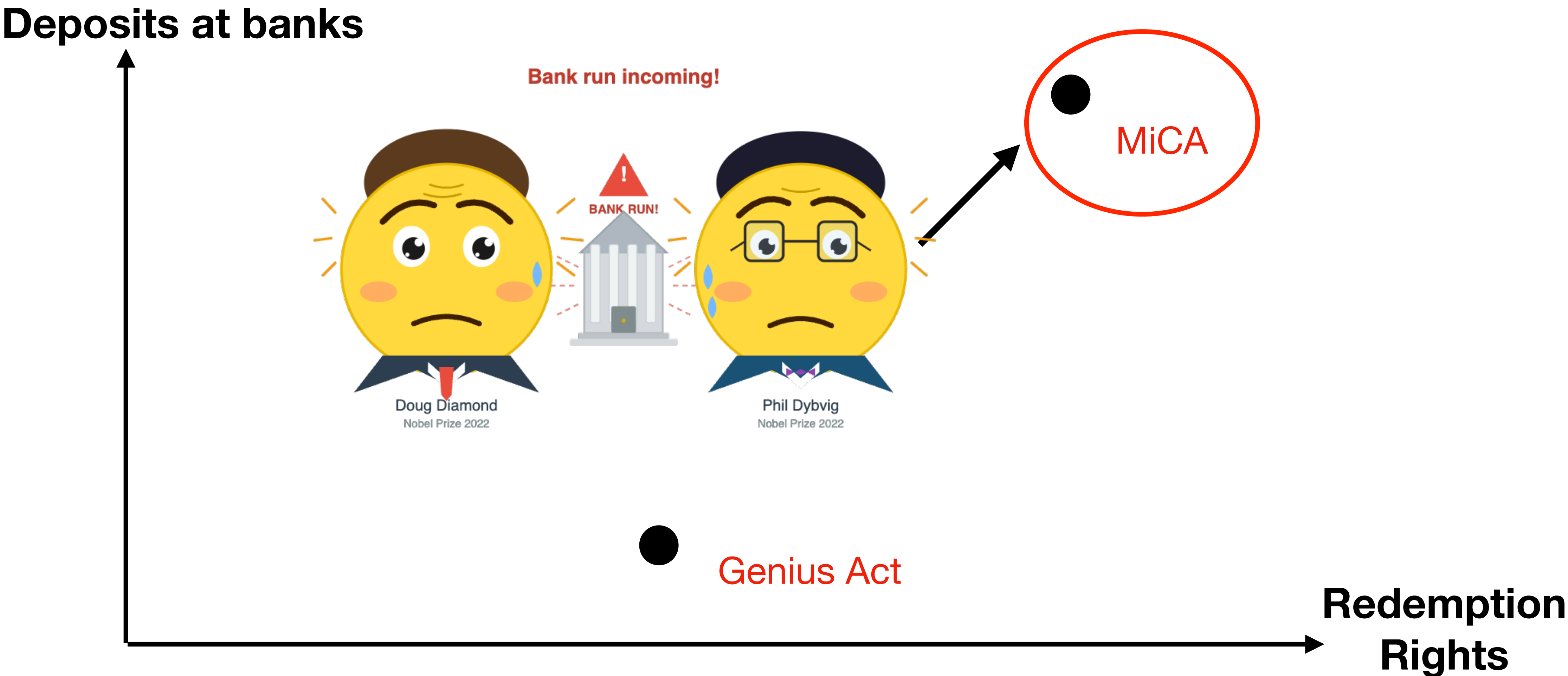
funds held in UST or in reserves in Fed accounts
redemption on demand - could be from qualified institutional investors only



Genius Act

Redemption
Rights

Risk 2: Financial Stability (Genius Act vs EU MiCA)



Conclusion

- The paper would gain from leaning harder into what's distinct about SCs
- Paper studies one stablecoin risk: they deprive banks of useful information
- Correct... but this risk is shared by other type of nonbanks digital payments
- SC risk may lie with compliance arbitrage, currency competition, or run dynamics