

ISSUER COMMENT

Iceland: 2012 Budget Plan Is Positive, But Full Implementation of Targets Will Be Crucial

Table of Contents:

SIGNIFICANT FISCAL CONSOLIDATION HAS BEEN ACHIEVED	3
LEGAL RISKS TO PUBLIC FINANCES ARE GRADUALLY BEING ELIMINATED	4
SUSTAINED REDUCTION OF PUBLIC DEBT WILL BE KEY DRIVER FOR ICELAND'S CREDITWORTHINESS AND RATING	4
RISKS TO THE FISCAL OUTLOOK REMAIN SIGNIFICANT	4
MOODY'S RELATED RESEARCH	6

Analyst Contacts:

LONDON	44.20.7772.5454
Kathrin Muehlbronner	44.20.7772.1383
<i>Vice President-Senior Analyst</i>	kathrin.muehlbronner@moodys.com
Yves Lemay	44.20.7772.5512
<i>Managing Director-Banking</i>	yves.lemay@moodys.com
NEW YORK	1.212.553.1653
Kristin Lindow	1.212.553.3896
<i>Senior Vice President</i>	kristin.lindow@moodys.com
Bart Oosterveld	1.212.553.7914
<i>Managing Director-Sovereign Risk</i>	bart.oosterveld@moodys.com

The continued fiscal consolidation targeted by Iceland's 2012 budget plan is positive. It follows two years of significant fiscal consolidation which are expected to reduce the general government deficit from a peak of 13.5% of GDP in 2008¹ to an estimated 5.7% of GDP this year. Fiscal risks associated with litigation are receding following the recent Supreme Court decision related to the Emergency Legislation. At the same time, we note that the government's fiscal plan envisages a slower pace of implementation than had been agreed earlier under the IMF Stand-By Agreement. With Iceland's public debt ratio still at very high levels, full implementation of the fiscal targets is essential to bring public debt back onto a sustainable path and ease the downward pressure on its Baa3 rating, which currently carries a negative outlook.

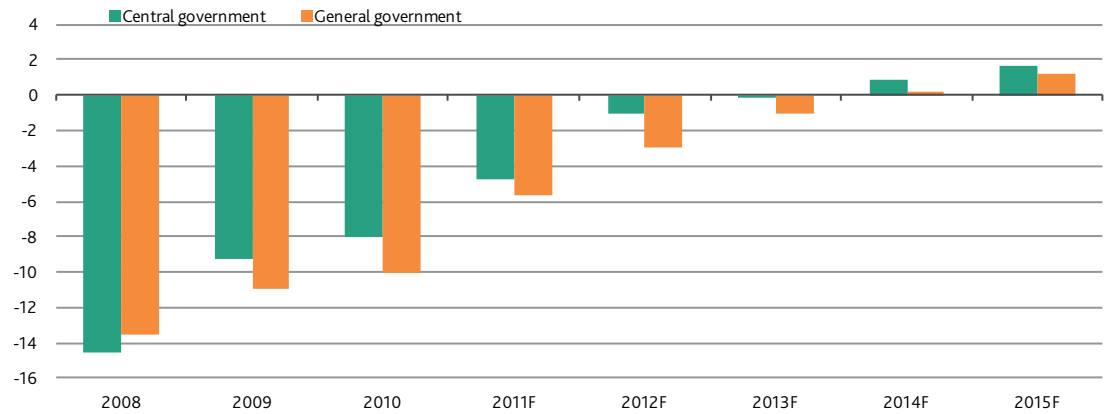
The Icelandic government presented its budget plan for 2012 to parliament last month. The draft budget which needs to obtain parliamentary approval before year-end aims to achieve the following targets:

- » A central government budget deficit of 1% of GDP, compared to an estimated deficit of 2.6% of GDP in 2011. When including the recapitalisation of HFF (Housing Finance Fund) and savings banks, the 2011 deficit increases by 2.2% of GDP to 4.8% of GDP.²
- » A central government primary surplus of 2.2% of GDP compared to a broadly balanced primary budget this year.
- » Most of the improvement in the deficit is to come from increased revenues through targeted tax hikes and reductions in tax deductions (amounting to 1.2% of GDP), which will largely remain in place until 2015.
- » Measures on the expenditure side are more moderate, accounting for less than 30% of the fiscal adjustment or 0.5% of GDP.

¹ This includes write-offs amounting to 13% of GDP. The write-offs were mainly the result of central bank recapitalization and securities lending contracts that failed after the "old" banks collapsed.

² In addition, we estimate the aggregate deficit at the municipal level to add close to 1% of GDP to the overall budget deficit.

FIGURE 1
Fiscal Balance
 (% of GDP)



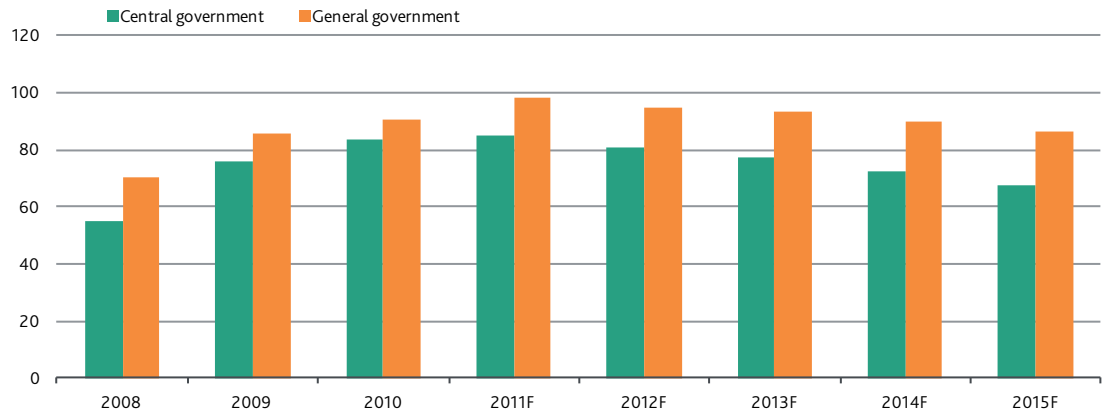
Source: Ministry Finance of Iceland, 2011 and 2012 general government deficit are Moody's forecasts

The government also presented its revised medium-term fiscal consolidation plan until 2015 which foresees continued progress over the coming years, but at a somewhat slower pace than had previously been agreed with the IMF under its Stand-By Program. While the earlier plan had assumed that an overall surplus in the general government budget would be achieved in 2013, this is now being postponed by a year. Also, the primary surplus targeted for the medium term is now being lowered by a percentage point from the previous 6% of GDP. The government argues that the slower pace of deficit reduction is feasible as the public debt burden is smaller than initially expected³. A slower deficit reduction would also support economic growth.

Under the government's revised plans the debt ratio would indeed be on a firm downward path in the coming years (see chart below). Still, aiming for more aggressive targets would have provided a stronger platform for rating stability as it would allow the authorities to establish full fiscal credibility early on after the completion of the IMF program, which provided an important external "anchor" for fiscal credibility over the past three years.

³ The IMF now forecasts a peak in Iceland's gross public debt ratio of 100% in 2011, compared with its earlier forecasts which predicted a debt ratio peak at 136% of GDP in 2010.

FIGURE 2
Public Debt Ratio
 (% of GDP)

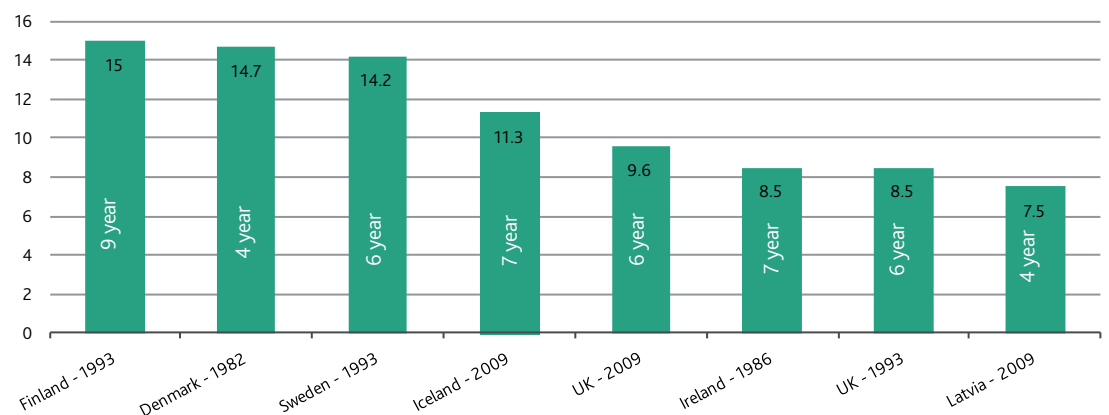


Source: Ministry of Finance of Iceland, IMF and Moody's

Significant fiscal consolidation has been achieved

We acknowledge that the Icelandic authorities have been implementing important fiscal consolidation measures over the last two years. Assuming that the 2012 budget target will be achieved, the total fiscal adjustment will amount to 8% of GDP between 2009 and 2012. This is a significant achievement, in particular against the background of the deep recession over the past two years in Iceland. The new budget plan envisages a further (more moderate) adjustment of 2.4% of GDP in the primary balance between 2012 and 2015, thereby bringing the total fiscal adjustment for the period 2009-2015 to more than 11% of GDP. This is broadly in line with the fiscal adjustment achieved by the Nordic countries during the resolution of their crises in the early 1990s.

FIGURE 3
Fiscal Reversal in Selected Countries
 (% of GDP)



Source: Central Bank of Iceland, Improvement in primary balance over time frame indicated

Legal risks to public finances are gradually being eliminated

A recent decision by the country's Supreme Court on the legality of the Emergency Legislation has removed a significant (albeit in our view low-probability) risk to the government's finances. The Court upheld the priority claimant position of depositors over other obligors (including bondholders) of the "old" banks in winding-up process. In the context of the Icesave issue, the decision means that the expected asset recovery from the Landsbanki estate will most likely be sufficient to repay the UK and Dutch deposit insurance funds in full.⁴ The repayments are expected to start early next year at the latest. Litigation risks related to the eventual resolution of the Icesave issue remain, but we note that the high asset recovery from the Landsbanki estate also mitigates this risk to an important degree.⁵

Sustained reduction of public debt will be key driver for Iceland's creditworthiness and rating

With legal and banking-sector related risks receding, our credit analysis is increasingly focusing on the Icelandic government's financial strength and its ability to reduce its very high public debt levels to sustainable levels over the coming years. While we acknowledge that the authorities have made important initial strides in this respect, the government will have to implement further sustained fiscal consolidation measures over several more years. Over the past three years, the IMF program has provided an important external "anchor". Going forward, the Icelandic government's ability to achieve its fiscal targets and steer its debt ratio along a clear and sustained downward path will be an important driver for Iceland's creditworthiness and rating.

Risks to the fiscal outlook remain significant

The most significant risk to the government's medium-term fiscal plan emanates from the economy. According to the IMF's debt sustainability analysis, a permanent reduction in the average GDP growth rate by 0.5 percentage points would result in an increase of the debt ratio to 107% of GDP versus the baseline assumption of a decline to 81% of GDP by 2016.⁶ The Icelandic economy has finally emerged from the deep recession of 2009-2010, with real GDP growth amounting to 2.5% in H1 2011 and leading indicators pointing to a continuation of this trend in Q3. But the government's growth assumption underpinning the draft budget for 2012 is quite optimistic at 3.1%, against the background of a slowdown in global growth, which would affect Iceland's exports and might well delay foreign investment. Although Iceland's key trading partners are in the EU, the impact of a slowdown in growth there is probably less pronounced. The prices of two of Iceland's key export products (aluminium and fish) are determined by global markets and export volumes for Iceland are constrained more by supply considerations than demand abroad.

The uncertainty over the medium-term economic outlook also remains considerable. Growth in Iceland's undiversified and small economy crucially depends on a few large-scale investment projects and will also be determined to a large extent by the pace of capital account liberalisation. GDP growth could therefore turn out to be significantly lower, thus requiring further fiscal adjustment measures beyond those assumed in the government's fiscal plan.

⁴ The latest information from the Winding-Up Committee of Landsbanki indicates a recovery ratio of 98% of all priority deposit claims as of June 2011.

⁵ As of now, it is still unclear whether and if so when the EFTA Surveillance Authority (ESA) will refer the issue to the EFTA Court. Should the EFTA Court then find Iceland in breach of its obligations regarding deposit insurance, this may give rise to further liabilities for the Icelandic government.

⁶ See IMF, Sixth Review, August 2011.

Secondly, the current fiscal projections are based on the assumption that the government will not take on any further additional liabilities as it did last year with the recapitalisation of HFF, which nevertheless remains thinly capitalised. Total outstanding guarantees for publicly owned companies (mainly HFF and the power company Landsvirkjun) amount to ISK1,335 billion or around 80% of GDP.

Thirdly, the local government sector will have to contribute to the fiscal consolidation effort. We view positively the recent approval (after some delays) of a new local government fiscal framework, which will become effective from 2012 onwards. It imposes strict limits on municipal borrowing, tighter monitoring of the municipalities' budget execution and a rolling three-year balanced budget target. Given that the debt levels of several municipalities are currently significantly above the newly established limit of 150% of revenues, we believe that full implementation of the new framework will be crucial.

Moody's Related Research

Analysis:

- » [Iceland, April 2011 \(124232\)](#)

Special Comments:

- » [Rejection of Icesave Agreement Has No Immediate Rating Impact, April 2011 \(132790\)](#)
- » [Market Use of Sovereign Ratings, September 2010 \(127353\)](#)
- » [Sovereign Credit Risk in Eurozone Countries Under Stress \(129633\)](#)

Issuer Comment:

- » [Iceland's Recent Supreme Court Decision on Foreign-Exchange-Linked Bank Loans Reduces Uncertainty But No Rating Impact, September 2010](#)

Rating Methodology:

- » [Sovereign Bond Ratings, September 2008 \(109490\)](#)

To access any of these reports, click on the entry above. Note that these references are current as of the date of publication of this report and that more recent reports may be available. All research may not be available to all clients.

 Report Number: 137403

Author
 Kathrin Muehlbronner

Editor
 Maya Penrose

Production Associate
 Amanda Ealla

© 2011 Moody's Investors Service, Inc. and/or its licensors and affiliates (collectively, "MOODY'S"). All rights reserved.

CREDIT RATINGS ISSUED BY MOODY'S INVESTORS SERVICE, INC. (MIS) AND ITS AFFILIATES ARE MOODY'S CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES, AND CREDIT RATINGS AND RESEARCH PUBLICATIONS PUBLISHED BY MOODY'S ("MOODY'S PUBLICATIONS") MAY INCLUDE MOODY'S CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES. MOODY'S DEFINES CREDIT RISK AS THE RISK THAT AN ENTITY MAY NOT MEET ITS CONTRACTUAL, FINANCIAL OBLIGATIONS AS THEY COME DUE AND ANY ESTIMATED FINANCIAL LOSS IN THE EVENT OF DEFAULT. CREDIT RATINGS DO NOT ADDRESS ANY OTHER RISK, INCLUDING BUT NOT LIMITED TO: LIQUIDITY RISK, MARKET VALUE RISK, OR PRICE VOLATILITY. CREDIT RATINGS AND MOODY'S OPINIONS INCLUDED IN MOODY'S PUBLICATIONS ARE NOT STATEMENTS OF CURRENT OR HISTORICAL FACT. CREDIT RATINGS AND MOODY'S PUBLICATIONS DO NOT CONSTITUTE OR PROVIDE INVESTMENT OR FINANCIAL ADVICE, AND CREDIT RATINGS AND MOODY'S PUBLICATIONS ARE NOT AND DO NOT PROVIDE RECOMMENDATIONS TO PURCHASE, SELL, OR HOLD PARTICULAR SECURITIES. NEITHER CREDIT RATINGS NOR MOODY'S PUBLICATIONS COMMENT ON THE SUITABILITY OF AN INVESTMENT FOR ANY PARTICULAR INVESTOR. MOODY'S ISSUES ITS CREDIT RATINGS AND PUBLISHES MOODY'S PUBLICATIONS WITH THE EXPECTATION AND UNDERSTANDING THAT EACH INVESTOR WILL MAKE ITS OWN STUDY AND EVALUATION OF EACH SECURITY THAT IS UNDER CONSIDERATION FOR PURCHASE, HOLDING, OR SALE.

ALL INFORMATION CONTAINED HEREIN IS PROTECTED BY LAW, INCLUDING BUT NOT LIMITED TO, COPYRIGHT LAW, AND NONE OF SUCH INFORMATION MAY BE COPIED OR OTHERWISE REPRODUCED, REPACKAGED, FURTHER TRANSMITTED, TRANSFERRED, DISSEMINATED, REDISTRIBUTED OR RESOLD, OR STORED FOR SUBSEQUENT USE FOR ANY SUCH PURPOSE, IN WHOLE OR IN PART, IN ANY FORM OR MANNER OR BY ANY MEANS WHATSOEVER, BY ANY PERSON WITHOUT MOODY'S PRIOR WRITTEN CONSENT.

All information contained herein is obtained by MOODY'S from sources believed by it to be accurate and reliable. Because of the possibility of human or mechanical error as well as other factors, however, all information contained herein is provided "AS IS" without warranty of any kind. MOODY'S adopts all necessary measures so that the information it uses in assigning a credit rating is of sufficient quality and from sources MOODY'S considers to be reliable including, when appropriate, independent third-party sources. However, MOODY'S is not an auditor and cannot in every instance independently verify or validate information received in the rating process. Under no circumstances shall MOODY'S have any liability to any person or entity for (a) any loss or damage in whole or in part caused by, resulting from, or relating to, any error (negligent or otherwise) or other circumstance or contingency within or outside the control of MOODY'S or any of its directors, officers, employees or agents in connection with the procurement, collection, compilation, analysis, interpretation, communication, publication or delivery of any such information, or (b) any direct, indirect, special, consequential, compensatory or incidental damages whatsoever (including without limitation, lost profits), even if MOODY'S is advised in advance of the possibility of such damages, resulting from the use of or inability to use, any such information. The ratings, financial reporting analysis, projections, and other observations, if any, constituting part of the information contained herein are, and must be construed solely as, statements of opinion and not statements of fact or recommendations to purchase, sell or hold any securities. Each user of the information contained herein must make its own study and evaluation of each security it may consider purchasing, holding or selling.

NO WARRANTY, EXPRESS OR IMPLIED, AS TO THE ACCURACY, TIMELINESS, COMPLETENESS, MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE OF ANY SUCH RATING OR OTHER OPINION OR INFORMATION IS GIVEN OR MADE BY MOODY'S IN ANY FORM OR MANNER WHATSOEVER.

MIS, a wholly-owned credit rating agency subsidiary of Moody's Corporation ("MCO"), hereby discloses that most issuers of debt securities (including corporate and municipal bonds, debentures, notes and commercial paper) and preferred stock rated by MIS have, prior to assignment of any rating, agreed to pay to MIS for appraisal and rating services rendered by it fees ranging from \$1,500 to approximately \$2,500,000. MCO and MIS also maintain policies and procedures to address the independence of MIS's ratings and rating processes. Information regarding certain affiliations that may exist between directors of MCO and rated entities, and between entities who hold ratings from MIS and have also publicly reported to the SEC an ownership interest in MCO of more than 5%, is posted annually at www.moody.com under the heading "Shareholder Relations — Corporate Governance — Director and Shareholder Affiliation Policy."

Any publication into Australia of this document is by MOODY'S affiliate, Moody's Investors Service Pty Limited ABN 61 003 399 657, which holds Australian Financial Services License no. 336969. This document is intended to be provided only to "wholesale clients" within the meaning of section 761G of the Corporations Act 2001. By continuing to access this document from within Australia, you represent to MOODY'S that you are, or are accessing the document as a representative of, a "wholesale client" and that neither you nor the entity you represent will directly or indirectly disseminate this document or its contents to "retail clients" within the meaning of section 761G of the Corporations Act 2001.

Notwithstanding the foregoing, credit ratings assigned on and after October 1, 2010 by Moody's Japan K.K. ("MJKK") are MJKK's current opinions of the relative future credit risk of entities, credit commitments, or debt or debt-like securities. In such a case, "MIS" in the foregoing statements shall be deemed to be replaced with "MJKK". MJKK is a wholly-owned credit rating agency subsidiary of Moody's Group Japan G.K., which is wholly owned by Moody's Overseas Holdings Inc., a wholly-owned subsidiary of MCO.

This credit rating is an opinion as to the creditworthiness or a debt obligation of the issuer, not on the equity securities of the issuer or any form of security that is available to retail investors. It would be dangerous for retail investors to make any investment decision based on this credit rating. If in doubt you should contact your financial or other professional adviser.