

This document represents a high level of thought and consideration about supervisory approaches to banking risks and minimum expectations from the banking industry in managing key risks. The collaboration between the Basel Committee Members and the Basel Consultative Group Members is evident, particularly in the discussion of proportionality. The line is constantly evolving between banks that represent systemic risks and those which do not, as was evident in bank failures in the United States this year.

The Core Principles should acknowledge that high levels of capital are not the solution to all risks, as a recently failed systemically important financial institution held some of the highest regulatory capital positions in the world, just before failure. Supervision must include a strong emphasis on corporate culture in addition to compliance with regulations, and this document precisely emphasizes this point.

A strong emphasis on operational risk recognizes that the future of finance, including digital transformation agendas, is heavily dependent on operational risks. This is particularly the case in how banks manage customer's personal data and how banks manage cyber risk/resilience. This will require new and innovative hiring practices from supervisors around the world as this skill set is non-traditional. Similarly, the new and appropriate emphasis on climate change is appreciated. The world's politicians can uselessly argue for years about causes of climate change, but they cannot reasonably argue about the effect that climate change is already having on the banking and insurance industries.

I believe the liquidity risks section might be strengthened by a heavier emphasis on the effects of social media and customer behaviors. I am not recommending more liquidity buffers but much stronger supervision of liquidity risk and expectations from bank management.

Regarding Principle 19, I believe liability concentrations should also be factored into supervisory approaches. Regarding Principle 29, I believe that deference should be given to a FATF assessment. However, the Core Principles should factor in the date of the most recent FATF assessment and whether the assessment remains relevant.

Great work!! Thanks to the authors!