The guidance on including climate-related financial risks (CRFR) to BCBS Core Principles remains generic and largely relies on existing tools. However, such tools cannot account for the specific nature of CRFR. They are not fit to take the "forward-looking approach" needed to do so, and do not tackle the radical uncertainty that characterizes climate change drivers and impacts.

Two major elements should be added to the Principles to mitigate this critical flaws:

1) Climate transition plans aligned with a 1.5°C objective should be key elements of risk management and supervision. These plans should notably include detailed GHG reduction targets, action plans, investment and resource planning. They should ensure that high emitting activities are properly managed, especially by ending the development of such activities and managing their phase-out.

2) Precautionary measures to address the potential risks related to specific activities that are major drivers of transition and/or systemic risks, notably by adjusting Pillar 1 capital requirements. Most notably exposures related to the fossil fuel sector, which are not compatible with the international climate commitments, should trigger higher capital requirements.