WWF Submission to the Standing Committee on Finance

Date: 30th January 2026

In response to the Call for input by the Standing Committee on Finance, WWF is pleased to submit the inputs below to inform the **2026 Forum on Financing Climate Action in Water Systems and the Ocean.**

WWF encourages the SCF Forum to consider how its analytical work, Forum outcomes and subsequent guidance can support the following priorities:

- Improving visibility and tracking of finance for ocean- and water-related climate action across UNFCCC financial mechanisms, to strengthen coherence, transparency and learning.
- Addressing financial design constraints, including mismatches between existing instruments and the risk profiles, time horizons and enabling conditions of ocean and water system interventions.
- Exploring targeted interventions within existing funds that can deploy concessional and risk-tolerant finance for ocean and water systems, without creating new institutions.
- Clarifying the role of a Blue Finance Window, which explores whether individual UNFCCC funds could establish their own ocean- or water-focused windows, tailored to their mandates, to better track blue outcomes and increase visibility.
- Strengthening country-driven and inclusive access, including support for Direct Access Entities and simplified pathways for locally led and community-based initiatives.
- Recognising enabling conditions, such as policy coherence, spatial planning, tenure clarity and data readiness as integral to effective de-risking and long-term impact.

I – Contextualization

The ocean, its ecosystems, rivers and wetlands (freshwater systems) are increasingly recognised in their role underpinning global climate stability (IPCC, 2019). They regulate temperatures and absorb carbon from our atmosphere, sustain livelihoods, water and food security, and support biodiversity and resilience for hundreds of millions of people. As such their role in delivering climate mitigation, adaptation and resilience outcomes has also been increasingly reflected across NDCs and NAPs (Khan, M. et al, 2025). However, finance for ocean- and water-based climate action within the UNFCCC climate finance architecture has yet to be fully aligned with this growing recognition and ambition. Funding remains fragmented, inconsistently tracked and difficult to access - particularly for Small Island Developing States, developing countries, and for the communities on the frontlines of climate impacts who are best placed to deliver locally led solutions.

Available evidence indicates that this gap is driven less by a lack of ambition or viable solutions and more by the design of existing financial instruments. Many current mechanisms are not well aligned with the risk profiles, time horizons, and enabling conditions required for effective interventions in ocean and water systems, which limits their ability to scale.

As the body mandated to improve coherence, coordination and transparency in climate finance, and to inform COP guidance to the Financial Mechanism, the Standing Committee on Finance (SCF) is uniquely positioned to address these challenges. In line with discussions emerging from COP30, the 2026 SCF Forum could provide a valuable space to examine how existing UNFCCC financial mechanisms, reporting processes, and guidance might be configured to better support ocean and water related climate action. It could also help generate insights that inform SCF analytical outputs and COP guidance aimed at strengthening the visibility, coherence, and delivery of these actions at scale.

WWF therefore welcomes the opportunity to provide input to the Standing Committee on Finance (SCF) for its 2026 Forum on *Financing Climate Action in Water Systems and the Ocean*. This submission recognises the deep interconnections between marine, coastal, freshwater and riverine systems, and their shared importance for climate mitigation, adaptation, resilience, biodiversity, food security and livelihoods. It builds on political signals and technical discussions emerging from COP30 in Belém, including WWF's *Ocean–Climate COP30 Expectations* paper and the *Climate, Coasts and Communities* report, which together emphasise that delivering Paris-aligned climate action depends on closing the persistent gap between ambition, finance and implementation for ocean and coastal systems.

II – The Opportunity: Aligning Finance with Ocean and Water Systems

Ocean- and water-based climate solutions are increasingly recognised across the UNFCCC and national planning processes (Ocean and Climate Change Dialogue, 2025). Many countries reference ocean, coastal or water-related measures in their NDCs and NAPs, spanning coastal adaptation, freshwater resilience, nature-based solutions, renewable energy, aquatic food systems, and broader resilience and risk reduction.

However, this recognition has not consistently translated into coherent, accessible, and scalable finance pathways. Where funding exists, it is frequently embedded within broader adaptation or mitigation categories, limiting visibility and strategic learning, and making it difficult for countries and practitioners to navigate available options.

Based on available evidence, three recurring constraints appear particularly relevant for the SCF Forum:

1. **Fragmentation and low visibility** - Interventions are dispersed across funds, focal areas and sectoral silos, reducing coherence and increasing transaction costs.
2. **Risk perception and misaligned instruments** – Many interventions face high upfront costs, long time horizons, exposure to climate hazards, and regulatory complexity; these realities are not always matched by appropriate concessional, risk-tolerant, or programmatic finance.

3. **Access and capacity barriers** – Complex procedures and limited technical assistance can exclude local actors and Direct Access Entities, including those best placed to deliver locally led solutions.

The 2026 SCF Forum presents a timely opportunity to focus on these design constraints and identify practical options to improve coherence, access, and outcomes.

III – What WWF is asking the Forum to do

WWF encourages the 2026 SCF Forum to function as an analytical space to examine how existing climate finance architectures support - or constrain - action in ocean and water systems. In particular, WWF suggests that the Forum be used to interrogate issues of visibility, financial design and access, compare experiences across funds and delivery contexts, and generate insights that can inform the SCF's analytical work and future COP guidance.

III – Illustrative Thematic Areas for the 2026 SCF Forum

To support the SCF in shaping the 2026 Forum programme, WWF offers the following illustrative thematic areas. These are intended as practical lenses through which the Forum could examine financial design, coherence and access challenges relevant to ocean and water systems, consistent with the SCF's mandate. The following themes illustrate how the Forum could be structured to address the constraints identified above:

Theme 1 - Improving visibility and coherence of ocean and water finance within UNFCCC mechanisms
This theme could examine how ocean- and water-related climate finance is currently categorised, tracked and reported across the UNFCCC Financial Mechanism, and the implications of fragmentation across funds and focal areas. It could explore options to strengthen visibility and coherence, including the potential role of approaches such as a *Blue Finance Window*, and consider how improved tracking could enhance learning, accountability and alignment with national priorities. This discussion should consider how any such approaches are designed to be complementary to existing climate finance mechanisms, rather than creating an additional or competing draw on already constrained resources. Strengthening coherence and visibility should aim to improve the effectiveness and targeting of finance, not dilute or displace funding needed for other critical mitigation and adaptation priorities.

Theme 2 - Aligning financial instruments with the characteristics of ocean and water system interventions
This theme could focus on how existing financial instruments align with the risk profiles, time horizons and enabling conditions required for ocean- and water-based climate action. Discussion could include the role of concessional and risk-tolerant finance, early-stage support and blended finance approaches, as well as lessons from country-driven and programmatic initiatives that have supported scaled delivery.

Theme 3 - Strengthening access, country ownership and locally led delivery
This theme could examine barriers to access for Direct Access Entities and locally led actors, and identify practical approaches to simplify procedures, strengthen readiness and technical assistance, and support

inclusive participation. It could also explore how improved access contributes to more effective, equitable and durable outcomes, particularly for communities on the frontlines of climate impacts.

IV – How Forum Insights Could Inform SCF Outputs

The 2026 SCF Forum provides an important opportunity to generate insights that can directly inform the SCF's core outputs. WWF encourages the Forum to be designed in a way that produces clear, usable takeaways that can feed into (i) Forum synthesis outputs, (ii) the SCF's analytical work, including future Biennial Assessments, and (iii) inputs to COP guidance to operating entities under the Financial Mechanism.

- **Enhanced categorisation and treatment of ocean- and water-related climate finance in future SCF assessments and analyses,** including Biennial Assessments, helping to improve visibility, comparability and understanding of how finance flows across mitigation, adaptation and resilience.
- **Clearer, evidence-based inputs from the SCF to COP guidance to operating entities**, particularly in relation to coherence, access and financial design, thereby supporting operating entities in aligning instruments and processes with the characteristics and delivery realities of ocean and water system interventions.
- **Forum synthesis outputs that strengthen the evidence base for aligning national priorities expressed in NDCs and NAPs with available financial instruments**, particularly given the growing integration of ocean action in national climate strategies - with 61 out of 66 coastal countries including at least one ocean-based measure in their 2025 Nationally Determined Contributions[2] - highlighting the importance of ensuring that finance architectures can respond effectively to articulated country needs.

By advancing understanding of financial design, coherence and access within existing institutions, the SCF can help reinforce the role of climate finance in enabling effective, scalable and country-driven action in ocean and water systems, consistent with its mandate to promote coherence and effectiveness across the climate finance architecture.

V – Conclusion

The 2026 SCF Forum on Financing Climate Action in Water Systems and the Ocean represents a critical opportunity to move from recognition to delivery. WWF encourages the SCF to use the Forum to focus on practical financial design choices that can improve coherence, reduce risk appropriately, simplify access and strengthen inclusion within existing climate finance mechanisms.

Exploring the concept of a Blue Finance Window - carefully framed as a coherence and enabling mechanism within existing institutions, complementary to wider nature-finance initiatives, and aligned with responsible finance principles - could form an important part of this discussion, including generating clear recommendations and practical suggestions for how it could be operationalised.

Aligning climate finance with the realities and potential of ocean and water systems is not a niche concern; it is central to the credibility and effectiveness of the climate finance architecture in delivering Paris-aligned mitigation, adaptation and resilience outcomes.

VI – Resources

IPCC, 2019: IPCC Special Report on the Ocean and Cryosphere in a Changing Climate [H.-O. Pörtner, D.C. Roberts, V. Masson-Delmotte, P. Zhai, M. Tignor, E. Poloczanska, K. Mintenbeck, A. Alegría, M. Nicolai, A. Okem, J. Petzold, B. Rama, N.M. Weyer (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA, 755 pp. https://doi.org/10.1017/9781009157964.

Khan, M., J. Baines, M. Lecerf, C. Savoldelli, R. Thoms, D. Hubbell, S. Hertel, X. Ma, A. Laura, S. Selvaratnam, L. Gil, T. Bahri. 2025. "The state of ocean-based climate action in 2025 nationally determined contributions: A preliminary update." Working Paper. Washington, DC: World Resources Institute. Available online at doi.org/10.46830/wriwp.25.00004

Ocean and Climate Change Dialogue. 2025. Informal summary report by the co-facilitators of the Ocean and Climate Change Dialogue 2025. Available at: https://unfccc.int/sites/default/files/resource/Informal_Summary_Report_Ocean_Dialogue_2025.pdf

WWF Ocean-Climate COP30 Expectations. 2025. WWF International, Switzerland. 5pp. Available at: https://wwfint.awsassets.panda.org/img/original/wwf-cop30-ocean-climate-expectations-paper-final-oct-2025.pdf

WWF. 2025. Climate, Coasts and Communities: Scaling Nature-based Climate Solutions for Resilient Coastal Communities and Ocean Ecosystems. WWF International, Switzerland. 44pp.

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