

#### Article

# SWOT analysis of rain tax in Canada

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Abstract: This study highlights the potential of stormwater fees, commonly referred to as "rain taxes", as a solution to urban stormwater management challenges within Canada, attributed to the increased urbanization and climate change impacts. A comprehensive SWOT analysis reveals the rain taxes ability to generate dedicated funding to be utilized for sustainable stormwater infrastructure, incentivizing property owners to reduce runoff, and enhance climate resilience. However, challenges such as administrative complexities, public resistance and possible uneven economic impacts may limit the taxation's widespread adoption. The paper highlights the importance of communication, equitable fee structures and community engagement to develop public acceptance and develop fairness. Opportunities for leveraging these taxes in order to drive green infrastructure investments, advancements within technology and inter-municipal collaboration are emphasized. Moreover, the study underscores the need for adaptive management strategies and consistent policy frameworks to approach long-term sustainability goals. Limitations of the SWOT analysis comprising of the subjectivity and possible lack of depth are acknowledged, emphasizing the importance of iterative reassessment in dynamic urban and environmental contexts. The findings within this analysis provides actionable insights for policymakers, stakeholders and municipalities to design and implement rain taxes effectively, ensuring their role as a key tool within Canada's urban sustainability strategies on the basis of stormwater management.

**Keywords:** stormwater management; green infrastructure; public policy; sustainability initiatives; environmental taxation

# 1. Introduction

The concept of a rain tax, more formally known as a stormwater fee, is an emerging policy mechanism in several Canadian municipalities. This fee is designed to address the environmental and financial challenges posed by stormwater runoff in urban areas. As urbanization increases, so does the presence of impervious surfacessuch as roads, roofs, and parking lots—which prevent water from naturally soaking into the ground, leading to excess runoff. This runoff can overwhelm drainage systems, causing flooding, erosion, and water pollution. In response, municipalities have sought ways to manage stormwater infrastructure effectively, with stormwater fees playing a critical role in financing the necessary upgrades. The Federation of Canadian Municipalities (FCM) reported that stormwater infrastructure is significantly underfunded, with many systems across Canada in dire need of maintenance and improvement. The rain tax is viewed as a sustainable solution that ensures property owners who contribute more to runoff-through large impervious surfaces-pay proportionally for the costs of managing stormwater. Urban areas in Canada face significant stormwater management challenges due to rapid development and the impacts of climate change. A report in 2019 by Environment and Climate Change

Canada highlights that traditional stormwater systems were designed primarily to channel water away from urban areas, but these systems are now often overwhelmed due to increased precipitation and ageing infrastructure. As storms become more frequent and intense due to climate change, urban flooding has become a pressing issue, exacerbating the strain on existing infrastructure. Ageing infrastructure is a major concern. According to the Canadian Infrastructure Report Card, 30% of municipal stormwater infrastructure in Canada is in "fair" or "very poor" condition, which increases the risk of system failure during extreme weather events. The report calls for substantial investment in stormwater infrastructure, estimating that billions of dollars are needed to bring these systems up to modern standards. The purpose of this study is to conduct a comprehensive SWOT (Strengths, Weaknesses, Opportunities, and Threats) analysis of the rain tax policy as a sustainable solution to stormwater management challenges in Canadian municipalities. This research aims to evaluate the policy's economic, environmental, and social impacts while identifying gaps in implementation and potential avenues for improvement. This study stands out as an original contribution to the literature by synthesizing insights from existing reports, such as those from the Federation of Canadian Municipalities and Environment and Climate Change Canada, while applying a structured analytical framework to evaluate the policy's effectiveness. While prior studies have primarily focused on the technical and financial aspects of stormwater fees, this research introduces a holistic perspective that integrates climate change impacts, urban development dynamics, and community engagement in stormwater management. By combining policy analysis with strategic evaluation, this study provides a unique lens for understanding the broader implications of the rain tax and offers actionable recommendations for policymakers and stakeholders.

# 2. Literature review

Several Canadian municipalities have implemented or are considering stormwater fees to manage the growing demand for stormwater infrastructure improvements. Kitchener was the first city in Canada to implement a stormwater utility in 2011. The city charges property owners based on the amount of impervious surface on their land. According to a study by XCG Consultants, Kitchener's stormwater fee generates millions of dollars annually, allowing the city to fund both traditional infrastructure upgrades and green infrastructure projects such as rain gardens and permeable pavements. These green solutions help reduce the volume of runoff and improve water quality. In Germany, many municipalities charge stormwater fees based on the amount of impervious surface on properties. This approach is part of broader efforts to manage urban runoff and promote sustainable water management practices. For example, cities like Stuttgart and Munich have adopted such fees, which incentivize property owners to invest in green infrastructure [1]. Several cities in the U.S. have implemented stormwater fees, Philadelphia, Pennsylvania introduced the Green City, Clean Waters program, which charges a stormwater fee based on impervious area and offers credits for green infrastructure practices, leading to significant reductions in runoff [2]. Similarly, Seattle, Washington's stormwater management program charges property owners based on the

amount of impervious surface. The city provides incentives for implementing on-site stormwater management solutions [3]. Cities like Melbourne and Sydney in Australia have implemented stormwater management fees as part of their water management strategies. Melbourne's approach encourages property owners to adopt sustainable practices to manage stormwater, including the use of rain gardens and permeable surfaces [4]. Some local councils in the UK, such as London and Bristol, have introduced charges to manage stormwater more effectively. These fees are part of broader environmental initiatives aimed at reducing flooding and enhancing urban resilience [5]. In the Netherlands, cities like Amsterdam have integrated stormwater fees into their urban planning strategies. These fees support investments in green infrastructure, such as green roofs and permeable pavement, to manage rainwater more sustainably [6]. Swedish municipalities have adopted fees based on the imperviousness of properties, encouraging the implementation of green solutions. For instance, Stockholm's stormwater management strategies emphasize sustainable practices to reduce runoff [7]. In 2016, Mississauga introduced its own stormwater charge, with the goal of generating approximately \$40 million annually to manage stormwater infrastructure [8]. The fee is calculated based on the total impervious area of a property, and property owners are encouraged to reduce their fees by adopting runoff mitigation measures, such as rainwater harvesting systems or installing permeable driveways. Early evaluations of the program suggest that it has successfully raised the necessary funds and encouraged environmentally friendly practices [9].

Edmonton has been a leader in stormwater management since implementing its stormwater utility in 2003. According to a study from the University of Alberta [10], Edmonton's system has helped reduce the risk of urban flooding by funding infrastructure upgrades and encouraging the adoption of low-impact development practices, such as green roofs and bioswales. The study also found that the city's approach has raised awareness about the importance of stormwater management among residents. Stormwater fees, also known as user-pay systems, align with the polluter-pays principle, which asserts that those who contribute to environmental degradation should bear the costs of managing its impact. Research by the International Institute for Sustainable Development [11] shows that stormwater fees create both economic and environmental incentives for property owners to adopt sustainable practices. The fees fund necessary infrastructure upgrades while encouraging property owners to reduce their impervious surfaces, helping to mitigate the environmental impact of urbanization. Green infrastructure, such as permeable pavements, green roofs, and rain gardens, plays a key role in stormwater management by mimicking natural water absorption processes. A study by the University of Waterloo [12] found that cities with stormwater fees tend to see higher rates of green infrastructure adoption, as property owners are financially motivated to lower their stormwater charges. The study also noted that stormwater fees lead to long-term savings for municipalities by reducing the costs associated with flood damage and emergency repairs.

# 3. Methodology

Examining news articles, blogs, and social media discussions about the rain tax

provides a window into public perception and allows for the identification of opportunities and threats. Media coverage often mirrors the broader societal discourse, helping researchers to understand how the policy is being framed, the key stakeholders involved, and the narratives influencing public opinion. Through media analysis, researchers can identify sentiments, such as whether the rain tax is perceived as an essential environmental protection measure or as an excessive financial burden on homeowners and businesses [13]. A critical aspect of this type of analysis is the ability to detect and address misinformation. Public discourse may sometimes be shaped by misunderstandings or inaccurate information about the rain tax, such as concerns over excessive taxation or inequitable impacts. By identifying these misconceptions, policymakers can craft better public communication strategies to address concerns, clarify the benefits, and foster more informed public debate. Conversely, the analysis can also reveal positive public sentiment, highlighting groups or individuals who view the rain tax as an innovative and necessary solution to urban water management challenges [14]. This provides an opportunity for further public engagement and policy refinement, showing readiness to embrace policies that address climate change, water infrastructure, and sustainability [15]. To analyze NVivo tool was used, it is a qualitative data analysis software that helps in coding and analyzing themes from media sources, including news articles, blogs, and social media posts. NVivo allows researchers to identify recurring patterns and issues, such as concerns over the tax's fairness or enthusiasm for its environmental benefits [16]. NVivo was used to organize and code the collected textual data. Themes and subthemes were identified, including environmental benefits, financial concerns, legal implications, and public misconceptions Recurring concerns about fairness and equity were coded as "financial burden," while discussions about environmental sustainability were coded under "benefits." NVivo's visualization tools, such as word clouds and thematic maps, highlighted frequently occurring terms and patterns. For instance, terms like "climate change," "flood prevention," and "unfair taxation" revealed polarized opinions on the policy. Additionaly Meltwater which is a media monitoring tool that tracks news coverage and social media discussions, allowing for insights into how the rain tax is being discussed across platforms was used<sup>1</sup>. Meltwater monitored multiple sources, including news websites, blogs, and social media platforms. Daily alerts were set up to capture mentions of the rain tax. Regional filters were applied to focus on Canadian municipalities implementing or debating the policy. Meltwater's sentiment analysis tools classified mentions as positive, negative, or neutral. Positive mentions emphasized environmental benefits, while negative mentions focused on perceived inequity and financial strain. Significant spikes in media coverage were analyzed in the context of specific events, such as extreme weather incidents or government announcements. Meltwater was used to identify key influencers driving discussions, including policymakers, environmental advocates, and business groups. These stakeholders' narratives were analyzed to understand their positions and strategies.

To further comprehend the SWOT analysis LexisNexis, A robust tool for conducting news and legal analysis, giving us access to both local and international media. LexisNexis allows for tracking long-term coverage and the evolution of public discourse on the rain tax, as well as identifying opportunities or threats from a regulatory perspective [17]. LexisNexis provided access to municipal bylaws, court

cases, and government reports on stormwater management. Keywords like "stormwater fee legislation" and "municipal infrastructure funding" guided the search. The legal frameworks of Canadian municipalities were compared to international case studies (e.g., the U.S. Clean Water Act). This analysis identified gaps in Canadian regulations and potential improvements based on global standards. LexisNexis tracked the evolution of stormwater policies in Canada, showing how legal and public challenges shaped their development. By utilizing these tools, we systematically analyzed media coverage to uncover themes related to strengths (e.g., widespread support for environmental initiatives), weaknesses (e.g., strong public opposition), opportunities (e.g., alignment with broader climate change agendas), and threats (e.g., political resistance or economic concerns) that could influence the implementation of the rain tax, iterative questionnaires and feedback rounds were conducted to gather expert opinions on the rain tax issue. It is known as the Delphi Technique. To gather expert insights on the rain tax's feasibility, implications, and potential improvements through iterative rounds of structured questioning. Experts in environmental science, urban planning, public policy, and economics were invited. Criteria included extensive experience in environmental taxation or municipal infrastructure management. Google Forms was used to design and distribute structured surveys. Each round built on the previous one, with summaries of responses shared with participants for review and refinement. Responses were anonymized to prevent bias or dominance by certain experts. The iterative process continued until consensus was reached on critical aspects of the rain tax [18,19]. The technique is also well-suited to complex issues like environmental taxation, where multiple perspectives are needed to fully understand the policy's potential impact on different sectors and stakeholders [20,21].

# 4. Strengths

The rain tax or stormwater fee is gaining traction in Canadian municipalities due to its ability to address pressing environmental and infrastructural challenges. One of the primary strengths of the rain tax is its fairness in distributing the costs of stormwater management [22]. Traditional property taxes fund stormwater systems, but these do not account for how much runoff each property generates. Stormwater fees, however, are calculated based on the amount of impervious surface on a property, meaning that those who contribute more to runoff pay proportionally higher fees. This ensures that the burden of maintaining stormwater infrastructure is shared more equitably [23]. According to XCG Consultants [24], the implementation of stormwater fees in Kitchener, Ontario, has been widely seen as more equitable than property taxes because the fee directly correlates to each property's impact on stormwater runoff. This encourages property owners to manage their runoff and reduce their fees by implementing green infrastructure solutions such as rain gardens and permeable pavements.

The rain tax not only provides municipalities with a dedicated revenue stream for stormwater management, but it also incentivizes property owners to adopt sustainable practices. Property owners can reduce their fees by implementing measures that minimize stormwater runoff, such as installing permeable pavements, rain barrels, or green roofs [25].

The International Institute for Sustainable Development (IISD) (2020) reports that stormwater fees have been shown to encourage the adoption of green infrastructure across municipalities. This has led to both environmental and economic benefits, including reduced flood risks and improved water quality. By directly linking the fee to runoff, municipalities encourage environmentally responsible behavior, which helps mitigate the impact of urbanization on local ecosystems [26]. One of the most significant strengths of the rain tax is that it provides a sustainable, dedicated funding source for stormwater management. In many Canadian cities, stormwater infrastructure has been historically underfunded, leading to aging systems that are unable to cope with increasingly frequent and intense weather events caused by climate change. Stormwater fees ensure that municipalities have the financial resources necessary to maintain, upgrade, and expand their stormwater systems. In Mississauga, Ontario, the introduction of a stormwater charge in 2016 created a sustainable funding model that generates approximately \$40 million annually for stormwater management [27]. This revenue is used to repair and upgrade aging infrastructure, helping the city mitigate flood risks and avoid costly emergency repairs [28]. Another strength of the rain tax is its ability to help mitigate urban flooding and prevent environmental degradation [29]. As cities grow and more land is covered by impervious surfaces, stormwater runoff increases, leading to higher risks of flooding, water contamination, and erosion. The funds raised through stormwater fees are critical for implementing solutions that manage runoff more effectively and protect natural waterways [30].

The Federation of Canadian Municipalities (FCM) (2016) highlights that cities with dedicated stormwater fees are better able to address the environmental challenges posed by increased urbanization. By funding necessary upgrades to stormwater systems, municipalities can reduce the incidence of localized flooding, protect water quality, and enhance overall urban resilience in the face of climate change [31,32].

As climate change leads to more frequent and severe rainfall events, Canadian cities must adapt their stormwater management systems to handle the increased volume of runoff [33]. Stormwater fees provide municipalities with the financial capacity to invest in climate-resilient infrastructure, including enhanced drainage systems and green infrastructure that can absorb and manage excess water more effectively.

A study by Environment and Climate Change Canada (2019) emphasized that cities with stormwater fees are better positioned to adapt to the changing climate. The ability to invest in long-term, resilient infrastructure is critical as municipalities face more frequent flooding and other storm-related challenges. By ensuring a stable revenue stream, stormwater fees help cities prepare for and respond to these emerging environmental threats [34].

# 5. Weaknesses

While the rain tax or stormwater fee has several strengths, it also faces challenges and criticisms that can hinder its implementation and effectiveness. One of the most significant weaknesses of the rain tax is the public's general lack of understanding about stormwater management and how their property contributes to runoff [35]. Many property owners may view the fee as just another tax, rather than a necessary investment in infrastructure and environmental protection. This lack of awareness often leads to public opposition, particularly from residents who may not see the direct connection between their property and stormwater issues [36]. A study conducted by Dalhousie University (2018) in Halifax found that public perception of the rain tax was generally negative [37]. Many residents did not understand why they were being charged a fee based on impervious surfaces, and there was confusion about how the revenue would be used. This public resistance can slow the adoption of stormwater fees, particularly in cities where there has been little prior education or outreach on the issue [38].

Another weakness is that the rain tax can disproportionately affect businesses, large property owners, and institutions with significant impervious surfaces, such as parking lots or large buildings [39]. These entities may face higher fees because of the amount of runoff they generate, which can be seen as unfair, especially for businesses that have little control over the design of their leased properties [40]. According to the Canadian Federation of Independent Business (CFIB) (2021), small businesses are often concerned about the financial burden of stormwater fees, particularly if they operate in high-density areas with significant impervious surfaces. The CFIB argues that many businesses, especially those leasing properties, are unable to make changes to reduce runoff but still have to pay the fees [41] This can lead to frustration and calls for more flexible fee structures or exemptions for small businesses. Administering stormwater fees can be complex, requiring municipalities to measure and track the impervious surfaces on each property, calculate fees, and provide options for credits or incentives for runoff reduction. This can involve significant upfront costs in terms of resources and technology. Smaller municipalities, in particular, may lack the capacity to implement such a system effectively [42].

In Kitchener, for example, the initial implementation of the stormwater fee involved extensive data collection to measure impervious surfaces across the city. According to XCG Consultants [43], this process was resource-intensive and required ongoing updates as properties were developed or altered [44]. For some municipalities, the administrative burden of implementing and maintaining such a system may outweigh the financial benefits, at least in the short term [45].

Many property owners view the rain tax as just another financial burden, especially in cities where property taxes are already high. In municipalities where stormwater services were previously funded through general property taxes, the introduction of a separate fee can feel like a new or extra tax, even if it replaces or reduces the stormwater component of existing taxes. This perception can be particularly problematic for residents on fixed incomes, such as seniors or low-income households, who may struggle to afford additional fees [46].

The Canadian Urban Institute [47] noted that municipalities need to carefully communicate the benefits of stormwater fees and how the funds will be used. Without clear communication, residents may resist the fee or pressure local governments to lower or eliminate it, which can undermine efforts to maintain and upgrade stormwater infrastructure [48].

The rain tax is primarily aimed at addressing stormwater issues in urban areas where impervious surfaces are prevalent. However, in rural or suburban areas, where natural land cover can absorb more water, the benefits of a stormwater fee may be less clear. Residents in these areas may feel that they should not have to pay for stormwater infrastructure if they do not contribute significantly to runoff [49]. A report from the Federation of Canadian Municipalities (FCM) (2016) highlights that while stormwater fees are effective in densely populated urban areas, their applicability and fairness in rural areas are less certain. Municipalities that cover both urban and rural regions may face challenges in designing a fee structure that is equitable across diverse property types [50]. Introducing a new fee is often politically sensitive. Elected officials may face opposition from constituents who are resistant to any form of increased taxation or fees, especially during election periods. In some cases, political leaders may be reluctant to support stormwater fees out of fear of losing voter support, even if the fees are necessary for long-term infrastructure improvements [51].

# 6. **Opportunities**

The implementation of a rain tax or stormwater fee in Canada presents several opportunities for improving urban infrastructure, enhancing environmental sustainability, and promoting climate resilience. Here are some key opportunities associated with the rain tax in Canada:

One of the primary opportunities provided by the rain tax is the promotion of green infrastructure solutions to manage stormwater more effectively. Property owners, particularly large businesses or institutions can lower their stormwater fees by investing in rain gardens, green roofs, permeable pavements, and other systems that reduce runoff and improve water absorption [52]. This could lead to a widespread adoption of sustainable infrastructure across Canadian cities. As reported by the International Institute for Sustainable Development (IISD) (2020), stormwater fees encourage the private sector to take a more active role in reducing their environmental footprint. In the long term, this can enhance urban ecosystems, improve water quality, and reduce flood risks [53].

The introduction of stormwater fees creates opportunities for innovation in water management technology and services. As more property owners seek to reduce their stormwater fees, there is likely to be an increased demand for cost-effective and efficient stormwater management solutions [54]. This can stimulate the growth of industries focused on designing and implementing water retention systems, permeable surface technologies, and other sustainable drainage solutions. The Water Research Foundation (WRF) (2017) has highlighted the potential for stormwater fees to spur advancements in smart water management technologies, such as Internet of Things (IoT) devices for monitoring stormwater flows. This growing market can benefit local economies and drive the development of innovative solutions to urban stormwater challenges [55]. Climate change is leading to more frequent and intense storms across Canada, increasing the risk of urban flooding and infrastructure damage. A dedicated stormwater fee can help municipalities build and upgrade infrastructure that is resilient to the impacts of climate change. This includes expanding stormwater systems, enhancing drainage capacity, and integrating natural solutions such as wetlands to absorb excess rainwater [56].

A report from Environment and Climate Change Canada (2019) emphasizes that cities with sustainable funding for stormwater management are better prepared to adapt to the effects of climate change. By investing in long-term infrastructure solutions, municipalities can reduce the costs associated with extreme weather events and protect vulnerable urban areas [57].

Many Canadian cities are struggling to fund necessary upgrades to ageing stormwater infrastructure, which has often been underfunded through general property taxes. A rain tax provides a dedicated revenue stream for stormwater management, helping to alleviate pressure on municipal budgets and ensuring that critical projects can be completed [58].

In Mississauga, the implementation of a stormwater charge has provided a stable source of funding that generates millions of dollars annually for infrastructure improvements. Other municipalities can seize this opportunity to strengthen their financial resilience by securing funding specifically for stormwater management [59].

Another opportunity linked to the rain tax is the potential for reduced insurance costs and minimized financial risks associated with flood damage. As stormwater management improves, the likelihood of flooding decreases, leading to fewer insurance claims for property damage. This can translate into lower premiums for both homeowners and businesses in areas with effective stormwater systems [60].

A study by the Insurance Bureau of Canada notes that municipalities with advanced stormwater management systems tend to have fewer instances of flood damage, which reduces the overall financial burden on insurers and policyholders. By mitigating flood risks, the rain tax can help curb rising insurance costs caused by climate-related flooding [61].

The implementation of a rain tax provides an opportunity for municipalities to engage with the public and increase awareness about the importance of stormwater management. Education campaigns can help property owners understand how they contribute to stormwater runoff and what steps they can take to reduce their fees by adopting sustainable practices [62].

As noted by Dalhousie University, when public engagement is incorporated into stormwater fee programs, property owners are more likely to support the initiative and participate in runoff reduction measures [63]. By fostering a deeper understanding of stormwater management, municipalities can encourage community participation and environmental stewardship. The rain tax also opens opportunities for collaboration between the public and private sectors. Municipalities can partner with private developers, businesses, and environmental organizations to develop stormwater solutions that benefit both the community and the environment [64]. This collaborative approach can lead to more innovative and cost-effective solutions to stormwater management challenges. For example, the Federation of Canadian Municipalities has advocated for public-private partnerships in stormwater management, emphasizing that these collaborations can accelerate the implementation of green infrastructure projects and lead to shared environmental and economic benefits [65].

### 7. Threats

While the rain tax (or stormwater fee) in Canada offers significant opportunities

for addressing stormwater management challenges, it also faces several potential threats that could undermine its effectiveness or implementation. These threats stem from public opposition, political challenges, administrative difficulties, and other factors. One of the biggest threats to the rain tax is public resistance, particularly from property owners who may view the fee as an unnecessary or unfair additional tax. Many homeowners and businesses may not understand the link between impervious surfaces and stormwater runoff, and they may not see the direct benefits of the tax in the short term. The lack of understanding can lead to strong opposition, protests, or pressure on local governments to reduce or repeal the tax [66].

The Canadian Federation of Independent Business (CFIB) has reported that many small business owners view stormwater fees as an added financial burden, particularly if they feel they have limited control over how much impervious surface their property contains. If this perception is widespread, municipalities may struggle to maintain public support for the tax, which could lead to political backlash [67]. The introduction of a rain tax can be politically contentious. Elected officials, particularly at the municipal level, may face pressure from constituents and interest groups to avoid introducing new fees or taxes. Politicians may fear that supporting a stormwater fee will hurt their chances of re-election, especially if the public does not fully understand the need for the fee [68,69].

A study by CivicAction [70] points out that stormwater management is often seen as a "hidden" service, meaning that the general public may not perceive its immediate importance. As a result, political leaders may be hesitant to push forward with the tax, and there is always a risk that a new government or council could roll back the policy after public outcry or electoral changes. Stormwater fees have been implemented in only a few Canadian cities, and the lack of a standardized approach across the country poses a threat to the overall success of the rain tax. The inconsistency in how municipalities approach stormwater fees means that some cities may delay implementing the tax, while others might introduce it with vastly different structures, leading to confusion and unequal protection against stormwater-related issues across the country [71]. The Federation of Canadian Municipalities (FCM) warns that the varying pace of implementation could lead to gaps in stormwater management. Some cities might fall behind in maintaining or upgrading their stormwater infrastructure, leading to increased vulnerability to flooding and infrastructure failure, while others excel in stormwater resilience [72]. Without coordinated national or provincial frameworks, the effectiveness of the rain tax may be diluted.

In times of economic hardship or recession, there is often increased resistance to new taxes or fees. Property owners, businesses, and even municipalities themselves may struggle with financial constraints, which could lead to delays in stormwater fee implementation or reductions in funding allocated for stormwater management. The Conference Board of Canada points out that municipalities reliant on property taxes and user fees face revenue challenges during economic downturns. In such periods, stormwater fees could be viewed as an additional burden, especially for low-income households and small businesses [73]. Financial constraints may also hinder investment in necessary infrastructure upgrades, leaving cities vulnerable to stormwater-related issues. Another potential threat to the rain tax comes from the legal challenges or organized lobbying efforts by affected groups, such as commercial

property owners, business associations, or residents who oppose the tax. These groups may challenge the legality of stormwater fees or attempt to reduce the scope of the tax through lobbying efforts [74]. The Canadian Environmental Law Association (CELA) has highlighted cases where municipalities faced legal opposition to stormwater fees, particularly from large businesses and industrial property owners. Such challenges can delay implementation, increase administrative costs, or force municipalities to make compromises that reduce the effectiveness of the fee in addressing stormwater issues [75]. Implementing and maintaining a stormwater fee system can be administratively complex, particularly in cities where data on impervious surfaces must be collected and updated regularly. Municipalities need to invest in technology and personnel to track property changes, assess runoff, and manage billing systems. Smaller municipalities with limited budgets may find it difficult to cover these upfront costs, potentially delaying or preventing the introduction of a rain tax. According to XCG Consultants, cities like Kitchener faced significant challenges in developing accurate systems for assessing stormwater fees. Managing and updating these systems over time requires ongoing investment, and if municipalities do not allocate sufficient resources, the tax may be inefficient or poorly enforced [76].

The rain tax can have uneven economic impacts, especially in urban areas with high property value disparities. Large commercial and industrial property owners, who typically have more impervious surfaces, may face higher fees, while residential property owners in wealthier neighborhoods may have the resources to mitigate runoff through landscaping or green infrastructure. This could lead to an uneven burden on certain sectors, which may exacerbate existing economic inequalities [77]. The Canadian Urban Institute emphasizes the need for careful fee structures to avoid placing a disproportionate burden on vulnerable populations or small businesses. If municipalities do not implement fair and flexible fee systems, the rain tax could face opposition from those who are disproportionately affected [78].

While stormwater fees are designed to address existing runoff and flooding issues, climate change is intensifying the severity and frequency of storms. This presents a challenge because even with the implementation of stormwater fees, municipalities may struggle to keep up with the pace of infrastructure demands as extreme weather events become more frequent. A report by Environment and Climate Change Canada highlights that stormwater systems in many Canadian cities are already under strain due to outdated infrastructure. As climate change accelerates, municipalities may need to invest even more heavily in stormwater management than currently anticipated. If the rain tax does not generate enough revenue to meet future demands, cities could still face significant infrastructure challenges, leaving them vulnerable to stormwater-related disasters [79]. The **Table 1** illustrates the strength, weakness, opportunities and threat of rain tax in Canada.

Strength	Weakness
<ul> <li>Promotes Fairness and Equity</li> <li>Encourages Green Infrastructure and Sustainable Practices</li> <li>Ensures Sustainable Funding for Infrastructure</li> <li>Mitigates Urban Flooding and Environmental Degradation</li> <li>Supports Climate Change Adaptation</li> </ul>	<ul> <li>Public Opposition and Lack of Understanding</li> <li>Disproportionate Impact on Businesses and Large Property Owners</li> <li>Administrative Complexity</li> <li>Limited Impact in Rural Areas</li> </ul>
Opportunities	Threat
<ul> <li>Stimulating Innovation in Water Management Technology</li> <li>Strengthening Municipal Finances</li> <li>Reducing Insurance Costs and Financial Risks</li> <li>Opportunity for Public Engagement and Environmental Education</li> <li>Promoting Collaboration Between Public and Private Sectors</li> </ul>	<ul> <li>Political Pushback and Policy Reversals</li> <li>Inconsistent Implementation Across Municipalities</li> <li>Economic Downturns and Financial Constraints</li> <li>Legal Challenges and Lobbying from Affected Groups</li> <li>Potential for Uneven Economic Impact</li> <li>Climate Change Exacerbating Stormwater Challenges</li> </ul>

Table 1. SWOT analysis.

# 8. Conclusion

The rain taxes, or stormwater fees, in Canada present promising solutions to the challenges posed by increased urbanization and climate change-induced extreme weather events. As highlighted in the SWOT analyses, their strengths lie in their potential to provide dedicated and sustainable sources of funding for stormwater management, promote the adoption of green infrastructure, and improve flood prevention and water quality. Moreover, they encourage property owners to take responsibility for their contributions to stormwater runoff, fostering environmental accountability.

However, these taxes also face significant weaknesses and threats, such as public resistance, administrative complexities, and the potential for uneven economic impacts on different types of property owners. Additionally, inconsistent implementation across municipalities and the risks of political and legal pushback pose further challenges to their success. Despite these issues, the rain taxes offer notable opportunities, particularly in fostering green infrastructure investments, driving technological innovation, and increasing climate resilience.

For the rain taxes to succeed in the long term, municipalities must invest in public education, promote fair and transparent fee structures, and ensure administrative efficiency. The threats posed by climate change, economic downturns, and political opposition can be mitigated through careful policy design, strong leadership, and collaboration between governments, businesses, and communities. Ultimately, if implemented and managed effectively, these taxes have the potential to significantly improve urban stormwater management and contribute to Canada's broader sustainability and climate adaptation goals.

To maximize the effectiveness of the rain taxes and mitigate potential threats, several key considerations must be taken into account. Effective communication strategies are critical for fostering public support. Municipalities should focus on educating the public about the importance of stormwater management, the risks of failing to address stormwater challenges, and the environmental benefits of sustainable infrastructure investments. Public engagement initiatives can also demonstrate how these taxes contribute to long-term environmental goals, such as reducing urban flooding and improving water quality.

Designing these taxes in a way that minimizes economic hardship is essential. Fee structures should be fair and equitable, allowing property owners to reduce their fees by implementing stormwater mitigation measures. Offering grants, rebates, or incentives for green infrastructure could encourage compliance and innovation, helping property owners reduce their impervious surfaces and stormwater impact.

A coordinated approach to stormwater fees across municipalities can prevent disparities in stormwater management and ensure that all regions are adequately protected against flooding risks. Provincial or federal guidelines could help create standardized best practices for implementing stormwater fees, ensuring consistency and fairness across jurisdictions.

While rain taxes provide essential funding streams, municipalities must continuously assess and invest in infrastructure to keep pace with climate change. Advanced monitoring technologies, predictive modeling, and partnerships with private and public sectors can ensure that cities remain resilient in the face of increasing stormwater challenges. Involving key stakeholders, such as businesses, environmental groups, and community organizations, in the planning and implementation phases of the rain taxes can foster collaboration and support. Engaging stakeholders ensures that these taxes are tailored to local needs and provides opportunities for innovation in stormwater solutions.

# 9. Practical implications

Conducting a SWOT analysis for the rain tax in Canada not only helps identify internal strengths and weaknesses as well as external opportunities and threats but also provides actionable insights for policymakers, stakeholders, and municipalities. Below are the practical implications derived from the SWOT analysis that can guide effective implementation and maximize the benefits of the rain tax.

# 9.1. Policy design

Policymakers can use the dedicated revenue stream from the rain tax to create targeted stormwater management programs. This can include investments in green infrastructure, community education initiatives, and incentives for property owners to adopt sustainable practices. Highlighting the long-term cost savings and environmental benefits of these investments can build public support and participation.

To mitigate public resistance and misconceptions, municipalities should prioritize transparent communication about the purpose and benefits of the rain tax. Engaging community members through informational workshops and forums can help demystify the tax and foster understanding of its necessity for effective stormwater management.

# 9.2. Community engagement and education

Effective education campaigns can transform public perception from viewing the rain tax as an additional financial burden to recognizing it as a critical investment in environmental and community health. Collaborating with local organizations and schools to promote awareness can foster community buy-in and participation in stormwater management initiatives. Involving various stakeholders, including local businesses, environmental organizations, and community groups, in the decision-making process can help tailor the rain tax to meet the specific needs of the community. This collaborative approach can build trust and support for the tax.

#### 9.3. Economic and financial strategies

The rain tax can include provisions for property owners to reduce their fees by implementing green infrastructure solutions. Municipalities could create grant programs or financial incentives to support property owners in making these investments, which would not only reduce runoff but also enhance community aesthetics and property values. To address the concerns of disproportionate impacts on certain property owners, municipalities should consider tiered fee structures based on the amount of impervious surface and socioeconomic factors. This can help ensure equity in the implementation of the rain tax while still promoting responsible stormwater management.

### 9.4. Infrastructure and technological advancements

Municipalities can leverage the funds generated from the rain tax to invest in smart water management technologies, such as real-time monitoring systems, to better manage stormwater flows and enhance system resilience. This investment can also create opportunities for local businesses in the environmental technology sector. Implementing regular assessments of stormwater management programs funded by the rain tax can help municipalities adjust strategies based on changing conditions, such as climate variability and urban development. This adaptive management approach ensures long-term effectiveness and resilience [80].

#### 9.5. Collaboration and coordination across municipalities

Establishing collaborative networks among municipalities can facilitate the sharing of best practices and experiences related to the implementation of the rain tax. This can help reduce administrative burdens and promote consistent approaches to stormwater management across jurisdictions. Advocating for provincial or federal support for the rain tax can strengthen its implementation. Government bodies can provide guidance, funding, and resources to municipalities to enhance the effectiveness of the tax and ensure that local jurisdictions have the tools necessary to manage stormwater effectively.

### 9.6. Addressing climate change resilience

The rain tax can be a key tool in funding climate adaptation strategies. Municipalities should prioritize investments in stormwater management solutions that enhance resilience to climate change impacts, such as increased rainfall and flooding. This includes retrofitting existing infrastructure and developing new green spaces to absorb excess water. Positioning the rain tax within the context of broader environmental and sustainability goals can create synergies with other initiatives, such as reducing urban heat, improving biodiversity, and enhancing community well-being.

# **10. Limitations**

The study faces some specific limitations associated with applying SWOT analysis to the rain tax. The identification of strengths, weaknesses, opportunities, and threats can be highly subjective. Different stakeholders, including policymakers, community members, and environmental experts, may have varying perceptions of what constitutes a strength or weakness of the rain tax. This subjectivity can lead to inconsistencies in the analysis and influence the decision-making process.

SWOT analysis tends to provide a high-level overview rather than a detailed examination of the complexities surrounding the rain tax. Important nuances, such as the varying impacts on different communities, economic conditions, and environmental factors, may be overlooked in the simplified four-category framework. This lack of depth could lead to incomplete or inadequate recommendations.

The insights from a SWOT analysis represent a snapshot in time. The dynamic nature of urban environments, regulatory landscapes, and climate change means that factors influencing the effectiveness of the rain tax can shift rapidly. As a result, conclusions drawn from the analysis may become outdated quickly, requiring frequent reassessment [81]. SWOT analysis identifies various factors, but it does not provide a clear pathway for translating these insights into actionable strategies. Without a structured approach to developing and implementing strategies based on the identified strengths, weaknesses, opportunities, and threats, the analysis may result in a lack of follow-through and ineffective policy initiatives [82].

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