CANADA'S NATIONAL STATUS.

The Status of Canada as an autonomous Entity is a subject of surpassing interest not only to the Canadian people but to the Empire at large.

It has been long a subject of controversy, but I have never seen a scientific definition of it. Even Mr. John S. Ewart, K.C., our most distinguished writer on Canada, her inception and her destiny, has, notwithstanding his pronounced predilections for her independence, never found for her any status except that of a Colony of Great Britain, or of the United Kingdom. All the English textbooks on Constitutional Law or Government, as well as exclusively Canadian works on the subject, accord with this view. Todd, Keith, Dicey, Clement, and others uniformly assume the Colony-status for all the Dominions, quite oblivious of the fact that, *inter se,* the Dominions differ radically, and that none of the others ever had a status on a parity with or approximating to that of Canada under its Constitution.

The works referred to were of course editions published before 1927.

As naturally as a boy aspires to full manhood, Canada has aspired to Sovereign Nationhood, and she has given utterance now and then to her aspirations. They became more insistent as the country unfolded its marvellous resources; and after the Great War and Canada's admission into the League of Nations as a signatory of the Covenant on which that League is founded, these aspirations culminated in an emphatic assertion of Canada's full Sovereignty. Though there were many dissidents, yet the Canadians who sponsored the claim had some notable auxiliaries. The Right Hon. Lloyd George speaking in Canada, declared that the Covenant of the League of Nations was the "Charter of Canada's new Nationhood," while other notable Englishmen—men high in public life, authors and editorial writers—again and again affirmed the same theory or doctrine in more or less identical language. Among these was Mr. Berriedale Keith, if I rightly understood his articles in the *Manchester Guardian* and other English Journals. But his latest contribution on the subject in the *Canadian Historical Review* of June,

1928, seems to abandon the National theory and to leave Canada still in a dependent or Colonial status.

The theory of Nationhood through the League of Nations was devoid of substance; and it has evanesced and evaporated. No accretive status could have been acquired by any Dominion through the League.

In November, 1926, the Imperial Conference faced the problem from a general viewpoint of the Empire and stated that the mutual relationship of Great Britain and the Dominions was one of equality. But while this was designed for a clarification, it merely generated new discords and controversies regarding its own interpretation; and it is still a matter of acrimonious dispute whether Canada is now a Sovereign Nation, or whether she is still a Colony, or whether she is merely an unclassified hybrid generated from the fused elements of a Colony and a Nation.

The Declaration, read by itself is an enigma. While it does not create or confer a status, it admits or assumes the existence of a status which it affirms. It says the status of the "autonomous Communities" of the Empire including Great Britain is—not that it shall be—one of equality. It leaves the subject there, without specifying where the equality lies, when it was attained, or of what it consists. It is not visible and we are mystified.

Is this equality merely a Legal fiction assuming and asserting something to be in existence which is not so in fact—a fiction invented either for classification purposes or to impart an historic background to an essentially new relationship?

We have passed the period of Legal fictions! The need for them vanished when Legislative machinery replaced the autocratic power of the Judges to make Law by their use; and such a matter as Canada's National Status cannot be rested on a base so obsolete and flimsy.

That equality among the "autonomous Communities" did not at the time of the Imperial Conference actually exist, is beyond dispute. But that an equality—a *pro tanto* equality—was created for Canada by the B. N. A. Act, 1867, and the Constitution conferred by it; and that by wrongful and perverse interpretations of these, Canada was again regraded and degraded into Colonial subordination, is I think open to demonstration.

The revulsion from this Colonialism and the reversion to the ideals—the true intent—of the Constitution of 1867 constitute the real arcana of the Declaration of 1926.

So we shall take them in order; and see how the one illumines the other.

THE B. N. A. ACT, 1867.

This Act signified or inaugurated a new departure in decentralized Empire Government. It was the first step in the direction in which the British Empire has since been evolving and is now consolidating. It displays a marvellous prescience on the part of the Canadian and the British statesmen at the time. But it is open to doubt whether any of them appreciated the full extent of the transformation in the relationship between them, effected by the Act. Even the architects or draftsmen of the Act may have been unappreciative of the greatness of their own achievement. However this may be, the fact remains that old things truly did pass away, and all things thenceforth were new under the B. N. A. Act, 1867.

Turn to the preamble which declares the intention of federally uniting the Provinces of Canada, Nova Scotia and New Brunswick into one Dominion with "a Constitution similar in principle to that of the United Kingdom." This is the most notable and, for the subject I am discussing, the most momentous part of the Act. Though it has been almost completely ignored in interpreting Canada's status in the past, it was truly the leaven of Canada's Nationality. Everything hung upon it, and particularly the Executive Government. Its implications were enormous; for anything pertaining to Executive Government which was left unexpressed in the Act was included on the principle of *similia similibus* through this preambulary declaration of intention.

It might indeed be said that the British Constitution was the protoplast from which Canada's Constitution was moulded as a perfect replica.

No other Colony, self-governing or otherwise, ever had, or has now, such a Constitution. Nor has any of the other so-called Dominions of the Crown. Subordination is repugnant to such a Constitution; and the preamble itself germinated or planted in Canada the principle of equality, which now startles people as if it were something new. It has been here all through the years, though obscured by dyslogistic phraseologies. Once more it is re-emerging into full bloom.

The Act, though it was long construed to be, yet it was not, a mere Parliamentary process for fusing four old Colonies into one big Colonial entity. The anterior Colonial system or relationship was

superseded by the B. N. A. Act, and in its stead a Federal Union was created with this unique Constitution. To this new Creation the Crown and Parliament of the United Kingdom in 1867 remitted and intended to remit absolutely, and in its own right as an Entity of the Empire, all the Sovereign, Legislative and Executive powers set out in or necessary implied either by the Act or the Constitution which it imparted.

The relationship or status of a Colony never pertained to Canada after 1867. That was the clear intention of the framers of the Act on both sides; and that intention should have governed the construction or interpretation of the Act.

Let me make this clear, for it is vital.

Through the preamble to the B. N. A. Act, 1867, we have in Canada the British Constitution *mutatis mutandis*, except in so far as it is limited by the Act itself. We have it not as a subordinate delegation, but as a generous endowment from Great Britain through her Parliament and in right of the Federal Union or Dominion of Canada itself as an entity of the Empire. This is the ark or repository of the Executive and Governmental powers of Canada. The Legislative powers are specifically conferred by the Act, and they are supreme and Sovereign.

The complement of these Legislative and Governmental powers which passed to Canada was Sovereignty; and after the Act came into operation Her Majesty, Queen Victoria, exercised the Sovereignty and Executive Government pertaining to Canada not as Queen of the United Kingdom but as Queen of Canada itself, and on the advice of the Privy Council of Canada. The Act itself so provides; and, except by violating the Act, the Sovereign could not be advised by any other Council upon matters within the competence of Canada. This is not only the principle of responsible Government and of the British Constitution imparted to us, but it was essential to the scheme of decentralized Empire Government then being inaugurated.

It was not intended that Canada should be *instanter* a full Sovereign Nation. She was, however, to be supreme in everything pertaining to the "peace, order and good government" of her people; but whether this was limited to the territorial boundary of Canada or not, is with other questions deferred for the present.

There were, however, as the result of the Act, for the United Kingdom and Canada, two separate spheres of control; and these, for convenience, I will call the inner and outer orbit. Neither authority was subordinate to the other either in substance or form.

THE INNER ORBIT.

This was circumscribed by the B. N. A. Act, 1867, and there Canada, through her Parliament and the Provincial Legislatures, was supreme with a "Constitution similar in principle to that of the United Kingdom"; and with Sovereign, Executive and Legislative powers in her own right. Within that orbit Canada was virtually independent and a Nation, *pro tanto*, with the Queen as its individual Sovereign. That was Canada's status—the status intended by the Act; and it is the basic rock, or rather the "root principle" of her equality of status which is affirmed by the Declaration.

There was nothing of Mr. John S. Ewart's "polywog" or "aquatic blob" about this highly developed Nationality in 1867. The transition stages, had all passed away, and all the wiggling appendages of Colonialism had disappeared. Not a vestige of them survived. Canada's future lay not in evolution from a germ but in accretions to her already attained but limited Sovereignty.

THE OUTER ORBIT.

All that lay beyond the B. N. A. Act, 1867, still remained with the United Kingdom—the Crown and Imperial Parliament. There they were supreme. But they had no rights within the inner orbit either of Government or Legislation. That was the design; and further this being a type of the new entities of the evolving Empire, the intention was that this outer orbit should gradually recede and Canada's inner orbit expand until it encircled the outer orbit—until it absorbed, in fact, all the power and prerogatives withheld. By these accretions to her powers Canada would in time reach the status of full Sovereign Nationhood. Her Constitution required no remoulding for this high status. Is'nt that remarkable?

That Canada was designed for a Nation and not a Colony is evidenced by the fact that in all the drafts of the Act—in all the resolutions on which it was formed—the new entity of Empire was called a "Kingdom." The British authorities were agreeable to the title, but at the last moment some stickler for formal precision suggested that it might be a little premature, and might antagonize the Americans and perhaps excite jealousy in other parts of the Empire. In these circumstances the word "Dominion" was adopted as a *modus vivendi*. It was emphatically the definitive name for the new species of Empire Entity which the B. N. A. Act established—a Constitutional creation with capacity for full Sovereignty, but with limitations on the exercise of that Sovereignty until they should be re-

laxed or extended as fitness required or the evolution of the Empire justified. The term "Dominion" was not a synonym for Colony or self-governing Colony. It signified a different genus; and as applied to New Zealand and Australia, it is an euphonious misnomer. Both of them are formed as Colonies and described as Colonies in their Constitutions. It was to surmount this status and reach a higher plane—a quasi—Nationhood within the Empire—that the Federal Union was formed; and as the possessor of this status it was designated designedly "the Dominion of Canada."

Of all the "autonomous communities" outside Great Britain, Canada alone can, without altering a foundation stone of her Constitutional structure, fit into the Empire planned and contemplated years ago by eminent Statesmen in words like these:—

(a) Equality among the Entities.
Absolutely independent Parliaments.
(Lord Balfour).
(b) Fully developed units—National Entities.
(Lord Milner).
(c) Freedom and independence of each Entity.
(Campbell Bannerman).

Canada to-day is the only true "Dominion" in the Empire except the Irish Free State, whose Constitution was by the famous Treaty of 1921 declared to be that of the "Dominion of Canada." Why was this distinguishing term used, if Canada's status was the same as the other so-called Dominions? It was the minimum of what Ireland then would accept; and Irishmen knew that Canada, in truth, was a Nation and accepted the status of Canada with that knowledge.

Retardments.

What, one may ask, retarded this great design which after years of submergence has now become resurgent?

Simply reactionary and obstructive forces which one finds in every sphere of progress and which, if yielded to, end in stagnation. Both here and in Great Britain these forces were intent on maintaining the *status quo*—an Empire of Great Britain and subordinate Colonies; and they could not conceive of any Empire whose constituents would be National entities with absolutely independent Parliaments.

For a time these forces held the progressive element of both countries in thrall. They first availed themselves of a flaw in the

B. N. A. Act, itself. It was this: For the new Sovereignty in Canada, the Queen, who by express provision in the Act, was to be advised only by the Privy Council of Canada, required a plenary representative—a Viceroy or Vicegerent resident in Canada and not amenable to any other control than that Privy Council. The Act however made no provision for the appointment of such a representative, or indeed of any kind of representative. It was silent on the subject though it imposed certain Regal duties on "the Governor-General" and "Governor-General in Council." These duties however fell far short of all the Sovereign functions that would be required of the Queen under Canada's Constitution, "similar in principle to that of the United Kingdom."

Being without guidance by the Act and without a precedent, in the dilemma the authorities at the time seem to have resorted by analogy to the system which had long prevailed of appointing Governors of Colonies by Royal Letters-Patent under Instructions from the Colonial Office. Such a Governor was merely a representative of Great Britain in the Colony; and in Canada he could not act solely on the advice of the Privy Council of Canada. That was a vital requirement of the B. N. A. Act; so that the appointment of such a Governor in Canada was quite subversive of the aim and design of Canada's Constitution.

This system was however adopted, and speedily it imparted to Canada the "inferiority complex." Everybody assumed from it the continuance of the old Colonial relationship. Though the system was somewhat modified in after years, yet the misconceptions engendered from it survived and permeated even the Courts of Canada which for years laid it down that the B. N. A. Act simply consolidated the old Colonies into one new Colonial entity called a Dominion; and that the powers conferred on the Dominion were those and those only of the old Colonies prior to the Federal Union. From this false premiss, they deduced the theory of British supremacy even in Legislation within the orbit of the B. N. A. Act.

There were some notable dissenters from this; but on the whole the view prevailed that Canada's legislative powers were subordinate to the Imperial Parliament, and that the Dominion was still a Colony.

Nothing conceivable could be more reactionary.

The new powers of Canada—Legislative as well as Executive—were neither co-extensive nor *ejusdem generis* with those of the old Colonies. The powers of the latter were subordinate leaving the Crown and Imperial Parliament dominant; while the new powers of

Canada under the B. N. A. Act, 1867, were original and primal investitures and as plenary and complete as the Imperial Parliament itself had in the plenitude of its power possessed them or as it could bestow. It had bestowed them on Canada and thereby divested itself of them. Within their orbit Canada was supreme and Sovereign.

The Privy Council itself decided this very principle—established it as a Constitutional axiom—in a series of judgments beginning in 1883 and extending, one might say, till the present day.

What they laid down was revolutionary. It overturned from their base all the conceptions of the Canadian Courts as to the nature of the Parliament and Legislatures of Canada and their powers; and, being the *ne plus ultra* of Judicial interpretation, these judgments should have, at once, corrected all the consequent fallacies about Canada's status and the super-supremacy of the Imperial Parliament. But this was not the effect. These fallacies are still rampant, even though they are based on hypotheses which those judgments of the Privy Council completely demolished.

The text-books which I have referred to are the chief propagators of these fallacies; and being without any other support, they have, in spite of the decisions referred to, resorted to the Colonial Laws Validity Act, 1865, as a basis for ascribing to the British Parliament a super-supremacy in Legislative matters within the orbit of the B. N. A. Act, 1867. Mr. Berriedale Keith says the latter Act "rests on the continued validity of the Colonial Laws Validity Act, 1865." If this were correct then the decisions of the Privy Council about Canada's supreme Legislative power are pure illusions. Either those decisions or Mr. Keith's views must go under; for they cannot both be true. Nor can they be glossed into harmony.

The Colonial Laws Validity Act, 1865, instead of being a basis for, was utterly repugnant to the B. N. A. Act, 1867. It never applied to the Dominion of Canada except as to matters which were external to her orbit; and as far as I know that is the only sphere in which it has been even referred to by the Privy Council. Take the *Nadan Case*,[1] It concerned the Prerogative right of the Crown exercisable outside Canada in regard to Appeals to the Privy Council. This was not within Canada's orbit. It was one of the matters withheld; and moreover the exercise of the Prerogative itself was regulated by Statutes of the Imperial Parliament enacted long before the Federal Union and, either as an *haereditas benefica* or an *haereditas damnosa*, these were passed over to Canada by Section 129 of the B.N.A. Act,

[1] (1926) A.C., P. 482.

1867; and they could not be repealed, abrogated or over-ridden by the Parliament or any of the Legislatures of Canada.

The *Nadan Case* is in complete harmony with the view I am expounding—that the supremacy of the Imperial Parliament lies and lies only in the outer orbit consisting of matters still withheld from Canada's exclusive control; and in that supremacy the Imperial Parliament does not require the support of the Colonial Laws Validity Act, 1865; for anything enacted by Canada outside her own orbit would be *ultra vires* and void, as was the Provincial Enactment in *Nadan's Case* prohibiting Appeals to the Privy Council.

The continuation in Canada by the B. N. A. Act, 1867, of the anterior English Statutory Law without imparting to Canada the authority to repeal or alter it is conclusive evidence that Parliament in 1867 deemed the Colonial Laws Validity Act, 1865, inapplicable to Canada's new status. The express certainty here excludes the implied; and besides that there is nothing in the Act of 1865 to authorize any legislation by the Imperial Parliament after the Act of 1867 came into operation with its plenary and supreme powers for Canada's Parliament and Legislatures within the orbit prescribed. The reservation of a super-supremacy in the Imperial Parliament, within the orbit, would have been a complete derogation from the powers conferred; or, in other words, a complete neutralization of the B. N. A. Act itself. There would be a complete repugnancy; and the so-called authority of the Imperial Parliament being only a construction founded on an erroneous assumption which leads to a clashing absurdity, it must disappear before the clear enactment by the B. N. A. Act of Canada's supreme legislative power as interpreted by the Privy Council.

Neither the status of Canada—its true relationship with Great Britain—nor the exclusiveness of her power to make laws through her Parliament and Legislatures within the orbit of the B. N. A. Act, 1867, ever went before the Privy Council. The Courts in Canada acting on the assumption of Canada's subordination, held that the word "exclusive" or "exclusively" used in Sections 91 and 92 could not extend to the Imperial Parliament, but was only a domestic barrier between the two legislative authorities in Canada. Construed thus, the word is not only superfluous but senseless; for the powers of the Legislative authorities in Canada are kept apart in two sections of the Act and cannot fuse. But it was the Imperial Parliament that made the enactment; and that the word "exclusive" was really intended to exclude itself, so far as anything relating to the

peace, order and good government of Canada is concerned, is an inevitable corollary from the decisions already referred to by the Privy Council—that the Legislative powers of the B. N. A. Act, 1867, were supreme and sovereign. The semi-sovereign status of Canada is a similar corollary from the same decisions.

The greatest obstructive forces of Canada were internal.

The Declaration.

Equality.

We are now in a position to present and to understand the Declaration itself.

The position and mutual relationship of Great Britain and the Dominions is stated thus:

> They are autonomous communities within the British Empire, equal in status, in no way subordinate one to another in any aspect of their domestic or external affairs. Every self-governing member of the Empire is now the master of its destiny. In fact, if not always in form, it is subject to no compulsion whatever.
>
> Equality of status, so far as Britain and the Dominions are concerned, is thus the root-principle governing our Inter-Imperial Relations.

The King.

Then it proceeds to correct administrative, legislative and judicial forms which "are admittedly not wholly in accord with the positions" just stated; and first, it corrects the title of the King so that his Sovereignty is now not one only for the United Kingdom with the British Dominions as dependencies thereof, but it is an individual Sovereignty or Kingship for each of them—"Great Britain, Ireland and the British Dominions beyond the Seas."

The Governor-General, a Viceroy.

As a Corollary of that it states:

> The Governor-General of the Dominion is the Representative of the Crown holding in all essential respects the same position in relation to the administration of Public Affairs in the Dominion as is held by His Majesty the King in Great Britain; and he is not the representative or Agent of His Majesty's Government in Great Britain or of any Department of that Government.

The Status.

Under this Declaration Canada at last emerges in the full glow of her rightful status and attributes.

Whatever it may be for others, manifestly this Declaration is no more than an interpretation in authoritative form of the B. N. A. Act, 1867, and of the Constitution imparted to Canada by that Act. It adds nothing to, and changes nothing in, or imparted by, that Act; but it levels down or corrects definitely the distorted views which have prevailed both here and in Great Britain regarding Canada's institutional position. In other words this Declaration defines the Constitutional position of Canada—her true status within the Empire —as it was capable of being defined by a correct interpretation of the B. N. A. Act, 1867, and as it should have been defined from the beginning.

Canada's Nationhood—her equality and individual Sovereignty are admitted; the Governor-General is declared to be the Viceroy of the King and not a representative of the British Government; and there is no supremacy in the Imperial Parliament over the matters within the orbit of Canada's Constitution. Truly it is marvellous; and for all this, remember, no statutory sanction is required either in the British or Canadian Parliament—a fact which proves that the relationship which has heretofore existed,—the assumed relationship of Colonial subordination—was not rooted in the B. N. A. Act or our Constitution, or attributable to any defects in either of them, but was created by misconceptions and misconstructions of both of them as the preceding exposition shows.

The status now acknowledged of Equality with Great Britain does not, of course, mean an instant expansion of Canada into full Sovereign Nationhood. It means that, within the Empire she is not a subordinate country but a distinct Sovereignty limited only by the B. N. A. Act, 1867, and invested at the same time with the Constitutional capacity to receive, as the exigencies of the Empire may demand or justify, all the prerogatives of the Crown pertaining to full Sovereign Nationhood.

In the limitation lies the meaning of the paragraph in the Declaration:

> Equality of status, so far as Britain and the Dominions are concerned is thus the root-principle governing our inter-Imperial Relations. But the principles of equality and similarity appropriate to status do not universally extend to function.

This has been called subtle metaphysics. But look at it!

Great Britain has two capacities, and so has her Parliament. One capacity is National; the other is Imperial or Empire-embracing. In her National capacity she is on an equality with the other entities;

but in her Imperial capacity she retains certain Prerogative and Legislative powers which, until now, did not function in the hands of the individual entities, but which did "universally extend to function" through her and the Imperial Crown and Parliament in the nature of a Trust for all the "Autonomous Communities" of the Empire. This *residuum* of what may be called Imperial Authority was, until now, entirely outside the orbit, for instance, of Canada's Constitution—the B. N. A. Act, 1867. On the other hand, this orbit —the inner orbit—was sacred from invasion by the Imperial Parliament unless upon some matter vitally affecting the Empire itself, and in the words of the Declaration "with the consent of the Dominion."

All is now clear, so that I may summarize the position thus:—

Canada had, under the B. N. A. Act, 1867, all the attributes of a Sovereign Nation—

(a) A Queen,
(b) A Parliament,
(c) Executive Government with the prerogatives of the Crown commensurate with the Legislative authority.

But by construction placed on the Act, not by anything prescribed by it, these attributes were limited to internal affairs of Canada. In other words, Canada had since 1867 the status of a Nation—an Equality of Status with Great Britain; but her National attributes did not extend to function beyond the territorial area of Canada.

The result of the Imperial Conference, 1926, is that Canada's National status being acknowledged, her orbit is extending, and her right to function in External Affairs is conceded.

The Future.

No more momentous words are in the Declaration than these:

> Every self-governing member of the Empire is now master of its destiny.

Canada's destiny lies in gradually expanding the orbit of the B. N. A. Act, 1867.

Wherever its limitations seem to hamper the full growth of the country, its institutions or its commerce, there they will be relaxed by the British Parliament in its Imperial capacity and in accordance with the wishes of Canada itself. But *festina lente* is still a good maxim is National affairs; and it should be Canada's watchword now in the rapid evolvements which we are witnessing.

The expansion has already begun by the inauguration, through the Imperial Conference itself, of a completely new system of diplomatic relationships with foreign countries. The reform is all based on the conception of individual nationhood. The making of Treaties is a conceded right; and their negotiation, form and ratification, as well as the appointment of plenipotentiaries, being all international concerns, are all readjusted in harmony with the fundamental principle laid down by the Imperial Conference of equality and individuality among the "autonomous Communities" within the British Empire.

These reforms being parts of the Executive Government of the King under the unwritten Constitution of Britain, of which Canada has the replica, need no statutory sanction. They have involved only the renunciation of effete dogmas, and the adoption of flexible machinery for diplomatic relationships.

There will be, however, a necessity for legislation by the Imperial Parliament declaratory of the status and rights now acknowledged. This, however, is only precautionary; for if it were omitted the Courts and Constitutional Writers might ignore the Declaration of the Imperial Conference and still proceed to formulate their doctrines as of yore. Of course, if they did, a case would go to the Privy Council, who are advisers of the King; and the King could not be advised by them to ignore the Declaration of the Imperial Conference.

Then the extra-territorial operation of Canadian Statutory Law is a matter which should receive the sanction of the Imperial Parliament; and great care and skill will be required in its draftsmanship.

Imperial Legislation will also be required to amend the provisions of the B. N. A. Act, 1867, with reference to "disallowance" by the King of Enactments of the Federal Parliament. The method of assenting to Bills may also require adjustment.

Disallowance is virtually obsolete; but the King has the Prerogative Right, regardless of his advisers, to refuse his assent to any Bill in England or elsewhere. How far it should be changed or restrained is a serious problem. In wise hands it is a tremendous power to even avert a catastrophe.

L'Envoye.

But the most momentous, and the most urgent, thing of all for Canada to do at this great juncture in her destiny when co-equal status of Nationhood within the Empire is accorded her, is to reknit the ruptured parts of her own Constitution by restoring to the three

Western Provinces the territorial Sovereignty over their lands which they are entitled to under the B. N. A. Act, 1867. That Act is the constitution of these Provinces as much as of the others, and the withholding of their lands is a distinct violation of it. This is an appaling wrong. I have spent ten years in trying to rectify it in the interest of Canada's own integrity as a Nation.

Now, that we have equality of Nationhood, let us have equality among the constituent entities of the Federal Union itself. That would be the ideal complement as well as the crowning glory of the achievement reflected in the Declaration of the Imperial Conference of November, 1926.

Regina. BRAM THOMPSON.