

tutional validity of the Act establishing this Commission was before the courts throughout the year.

In 1935 the Combines Investigation Act had been amended to provide that not only evidence given orally, but also any documents required to be produced in an investigation under the Act might not be used in subsequent criminal proceedings. During the session of 1936 a Bill was introduced to restore the Act in this particular to what it had been prior to the amendment of 1935. The Senate refused to accept the amendment and the Act remained without change. The Prime Minister expressed the intention of the Government to introduce in the session of 1937 a Bill amending the statute as proposed in the 1936 Bill and in other respects.

Combines Cases in 1935-36.—The Dominion Trade and Industry Commission, consisting of the three members of the Tariff Board, was charged with the administration of the Combines Investigation Act under the provisions of the Dominion Trade and Industry Commission Act, 1935, which came into effect on Oct. 1, 1935. On Nov. 5, 1935, the Commission Act was referred by Order in Council to the Supreme Court of Canada for decision as to its constitutional validity. In June, 1936, the Supreme Court pronounced the opinion that Section 14, dealing with price and production agreements, and Sections 19 and 20, concerning a "Canada Standard" trade mark, were unconstitutional. This decision was the subject of an appeal and cross-appeal to the Judicial Committee of the Privy Council. No decision had been delivered by the latter body at the close of 1936. As a result of these developments no extensive investigations were conducted under the Combines Investigation Act during the fiscal year 1935-36.

An investigation into the importation and distribution of anthracite coal in Canada, indicated in the Speech from the Throne at the opening of Parliament on Feb. 6, 1936, was conducted under the Inquiries Act. Dr. H. M. Tory was appointed as a Commissioner to conduct this investigation. Hearings were begun at Montreal on July 8, 1936, and public sessions were held at Montreal, Toronto, Quebec, Halifax, Saint John, and Ottawa. At the end of 1936 the investigation had not been completed.

Various preliminary inquiries were made, as in previous years, in connection with complaints relating to trade practices in particular industries, alleged to affect unfairly certain classes of persons and to be injurious to the public. For reasons already indicated this work was of a more limited nature in the latter part of the fiscal year.

Section 14.—Mothers' Allowances.

Six of the nine provinces of Canada provide for the payment of allowances to mothers who are widowed or without adequate means of support. The province of Manitoba was the first to make such provision in 1916, and the example has been followed by the other western provinces and by Ontario and Nova Scotia. The Mothers' Allowances Act, 1930, of New Brunswick has not been proclaimed in effect.

All the Mothers' Allowances Acts stipulate that the mother must be a resident of the province at the time of making application and a widow or, in all provinces but New Brunswick and Nova Scotia, a wife, whose husband is physically or mentally incapacitated. The section in the Alberta Act bringing the wife of a physically disabled man within its scope, has, however, not been proclaimed.

In Alberta, British Columbia, Ontario, and Saskatchewan, deserted wives are paid an allowance, and in British Columbia and Saskatchewan, the wives of inmates