

authority as an element of the Royal Prerogative. It is important to remember, however, that in Canada, unlike the United States, treaties do not, in themselves, become part of the "law of the land". Parliament or, if appropriate, provincial legislatures, must enact any legislation that may be necessary for the performance of treaty obligations. Because of this requirement to pass subsequent provincial legislation in cases where the subject matter falls under provincial responsibility, it is the practice in Canada to consult the relevant provinces prior to ratification or signature. This procedure is about as close as we come in Canada to the U.S. system.

Granted that Canada's treaty-making procedures are simpler than the USA's, we have not yet fully explored those differences in foreign policy approaches which flow from institutional differences. Americans quite properly hold their political institutions -- if not necessarily their politicians -- in awe and wonder. We in Canada are respectful but more relaxed about our own institutions -- as witness the fact that we are only now getting around to fetching our constitution home. The U.S. attitude colours the U.S. foreign policy approach in subtle ways. Thus there is an instinctive