

no addition would require to be so made. The point at which the transportation ceases, the cost of which is to be added to the value for duty, seems to be the point at which the last shipment by water is made, by means of which the goods are expected to reach Canada. In this instance, again, the language of the clause is singularly ambiguous, but it seems to be intended that the point of shipment in a vessel in a port of the country *ex quo* is the point at which the cost of inland-transportation, to be computed in the dutiable value, is to cease. And two modes are evidently pointed at by which the goods can afterwards reach this country, viz., directly from the port of shipment, and indirectly *via* a foreign port on this side of the Atlantic, reaching Canada from there by land, and the *transitus* spoken of in the clause must therefore mean the carriage of the goods across the ocean.

It is scarcely necessary to point out, that, although the meaning thus stated is probably the meaning intended to be conveyed by the words "*in transitu*," used in the resolution, they really possess no such distinctive signification, as they apply equally to a shipment direct to Canada and to a shipment to Canada *via* a foreign port.

I should therefore answer your questions, as follows :—

1. In my opinion the Collector was justifiable in demanding the addition of the cost of transportation from London to Liverpool, if London was the place of produce, growth, or manufacture of the article imported, but not otherwise.

2. I am of opinion, that if the same article had been shipped by steamer direct from London to New York, and thence to Canada over land there would be no addition to the value for duty by reason of such land transport.

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