

and to the middle of the main channels of such rivers respectively, and unless herein otherwise provided, shall also include every island, the whole or the greater part of which is comprised within the outlines of such township so prolonged: 10 Edw. VII. c. 2, s. 9.

"10. The last preceding four sections shall not extend to any islands which are townships by themselves or which have been expressly included in other townships in the original surveys and plans thereof remaining of record in the office of the Minister of Lands, Forests and Mines, or by statute, but the same shall remain townships or parts of such other townships respectively: 10 Edw. VII. c. 2, s. 10."

Thus we see from these provisions that in the case of river boundaries the middle of the main channel is the dividing line between the adjoining municipalities. But rivers are known to change their courses, and the main channel may be in one place to-day and in quite another place some years hence; and the question may arise: Is the municipal river boundary intended to be a fluctuating one following the vagaries of the river, or is the middle line of the channel, as it existed when the township were laid out, the fixed and unalterable boundary no matter what changes may thereafter arise in the situation of the main channel? There is something to be said in favour of a fixed and unalterable boundary. It is manifestly convenient that a piece of land should have a fixed and unalterable territorial designation and it is manifestly inconvenient that it should be liable to be one year within the territorial limits of one township and in the next year perhaps within the territorial limits of some other township and perhaps some other county. The difficulty of registering deeds affecting land subject to such fluctuations of territorial locality would be very great and it is hard to see how they could be surmounted under our present Registry Act.

Section 16 of the Surveys Act (R.S.O. c. 106) seems to favour the view that the boundary cannot be fluctuating, but is fixed, and unalterable except by statute. That section says: "All boundary lines of township . . . shall be the true and unalterable boundaries of all and every such townships . . ."

So far as the territoriality of river municipal boundaries is