

"The word 'section' does not necessarily mean one of the divisions of an Act numbered as such; but may refer, if the context requires it, to any distinct enactment, of which there may be several included under one number:" see *Dain v. Gossage*, 6 P.R. 103: head note 2. "The word section has no technical meaning, nor indeed any very exactly defined meaning. No doubt it is usually applied to the numbered paragraphs of an Act." It means a part divided or cut off." "If a piece of chalk were broken in two, each half would be a piece of chalk, and so, if the section of an Act consisting of distinct parts, be divided, I do not see why each part should not, in one sense, be called a section, because each is really a distinct enactment, although each would not be a numbered paragraph." (Per Mr. Dalton in the same case.)

Canadian statutes have usually been divided into clauses or sections, numbered consecutively, beginning with number 1, following the preamble. Down to the year 1857 Roman numerals continued to be used for the sections, as I., II., III., etc.: Arabic (or Brahmanic) numerals, 1, 2, 3, etc., were first used for the principal sections in the statutes of 1858 (22 Vict.). They had been in use for some time previously to that for sub-sections. The change from Roman to Arabic numerals was certainly an improvement.

The evolution of the sub-section is a matter of some interest. There seems scarcely to be a trace of what are now known as sub-sections in our early statutes. They appear for the first time, I think, in the statutes of 1852 (16 Vict., c. 22). The main or principal sections, were then, as we have seen, designated by Roman numerals. Where sub-sections were added Arabic numerals were used, beginning with number 1; and the reference would be, if the first sub-section were intended: "Sub-section 1, of section ---." For instances of this manner of numbering, see sections II., III., V., VI., of chapter XXII. of the statutes of 1852. What might be called sub-sections were in use at an earlier date, but they were either not numbered (sec. 33 Geo. III., 1793, c. V., s. 111; 10 & 11 Vict., 1847, c. 45, s. 111), or were clauses of a