

Boer forces during the South African War, and was afterwards tried at Bar: *cf. Rex v. Lynch*, 88 L.T. Rep. 26; (1903) 1 K.B. 444.

The trial of persons for murder or manslaughter committed on land outside the King's dominions or for being accessory thereto is now provided for by s. 9 of 24 & 25 Vict. c. 100, by which British subjects are made amenable to the English courts, whether or not the person killed was a British subject. This is a consolidating statute, which incorporates the provisions of the previous Acts, commencing with 33 Hen. VIII., c. 23, which had given the English courts this jurisdiction. By this law if two Englishmen arranged to go abroad to fight a duel and one of them were killed; the survivor could be tried for murder on his return to this country. Further, if British subjects were proved to have made themselves parties or accessories to the murders alleged to have been committed in the Putumayo or elsewhere, they would now be amenable to the English courts. Similarly under the provisions of the Acts for the suppression of the slave trade, now largely consolidated in 32 & 33 Vict. c. 2, a British subject who by any overt act made himself a party to any offence under these Acts could be tried and punished here, wherever his offence had been committed. The extensive provisions of these enactments reflect the practically unanimous determination of all civilised states to put an end to the traffic in slaves. Slave trading is treated as akin to piracy and as an offence which should be suppressed by co-operation between the nations. No doubt was felt by the committee of the House of Commons that slave-raiding and slave-driving and other forms of dealing in slaves, if indulged in by a British subject, would render him amenable to the English courts, although a restatement of the law was deemed desirable. They further recommended that the existing provisions of the law might be somewhat extended so as to cover the gravest offences against the person and any practices of forced labour which are akin to slavery. It is not clear what is meant by the expression "the gravest offences against the person." Murder and manslaughter committed abroad by a British subject are already triable here, and it can scarcely be intended to include