

ideal as the Constitution of the United States does, the *locus* of the line of cleavage of sovereignty being a matter of no importance in this connection. But if Mr. Dicey's remark is correct from this point of view, so also is the preamble of the British North America Act from another. If in outward form the Constitution of Canada closely resembles that of the United States in one important feature, in its inner nature it closely resembles the Constitution of England in a feature no less important. If we have borrowed from one country the principle of federalism we have borrowed from the other the equally important principle of responsible government. In the United States the administration, of which the President is the head, is organized for a fixed term of years; in Canada, as in England, the administration may change with each great fluctuation of public opinion. In the United States the heads of departments of the public service are chosen by the President in fact as well as in theory; in Canada, as in England, they are chosen with a view to securing the approval of Parliament and retaining its confidence. In the United States the Secretaries are not and cannot be members of either House of Congress; in Canada, as in England, Ministers not only may but must be members of one or the other of the Legislative Chambers. In the United States the Cabinet is subject in matters of policy to the will of the President, and Congress cannot dictate to him in the premises except by passing statutes; in Canada, as in England, the Cabinet is practically a Select Standing Committee of Parliament, which remains in existence only so long as it can control the votes and influence of a majority of its members. In the United States the President, the Senate, and the House of Representatives are a check on each other in legislation; in Canada, as in England, one House of Parliament is a check on the other, but the royal prerogative of veto in legislation has fallen into absolute disuse. The President of the United States can veto any statute on his own responsibility to the people who elected him; the Canadian Governor, like the English Monarch, can do that or any other public act only on