

Gray Metropolitan was null and void, inasmuch as Her Majesty had no power to issue such a patent for a colony possessing a separate legislature! Both the Cape and Natal have constitutional government: therefore Dr. Colenso's patent as Bishop is also of no value!

The judgment in which this extraordinary result is reached is said to be a masterpiece of legal reasoning; so conclusive that no one has ventured to impugn its correctness. But it is not a little singular, and by no means creditable to the successive legal advisers of the Crown, that these Sees should have been erected throughout the Empire, and a whole batch of Bishops consecrated, who are now discovered to have no powers at all. Nay, it is said that one or both of these very patents were issued when the author of this judgment (as Sir Richard Bethell) was Attorney-General, and of course under his advice. We believe it is held that the rite of consecration is still allowed to have conferred Episcopal powers upon the gentlemen who have received it, in so far as Confirmation and Ordination are concerned (though not in England!); but the invalidity of the patents deprives the Bishops of all *legal* authority, as rulers, over their clergy, so that some other means must be found of enforcing discipline.

The three Indian Bishoprics, with those of Nova Scotia, Jamaica, Antigua, and Barbadoes, are said to be unaffected by this decision, inasmuch as they have been recognised by Acts of Parliament. Another class of sees, created in colonies having a separate legislature, are of illegal origin; they are those of Fredericton, British Columbia, Nassau, Capetown, Grahamstown, Natal, Adelaide, New Zealand, Waiapu, Wellington, Nelson, and Christchurch. Those in Crown colonies, or in colonies endowed with legislative government since the patents were issued, are—no one knows where; and to this class belong St. Helena, Sierra Leone, Victoria, Labuan, Brisbane, Goulburn, and Perth. While a fourth class have not, and never had a shadow of a shade of legal right to be. These are the Bishoprics, created at the instigation of the Bishop of Oxford and others of his school, who would fain have the church of England a universal church, in places beyond the limits of the British dominions, as Honolulu, Central Africa, Melanesia, the Niger Territory, and Orange River. Thus out of some *forty-one* colonial bishops, appointed by the Crown, it is doubtful if there are more than ten whose patents are worth a straw!

It is an interesting question for us, in Canada, in what position this decision places the five Right Reverend gentlemen who have been appointed by Her Majesty's Royal Letters Patent to rule over the United Church of England and Ireland in this Province. All the dioceses here were erected by Royal proclamation. Each Bishop is made such by patent. His Lordship of Montreal is Metropolitan by the same authority. Even the elected bishops—of Quebec, Ontario, and Huron—were merely *recommended* to the Queen by their respective Synods. In theory she had the power to nominate others to their offices. The patents and the mandates of consecration emanated from the Crown. After this judgment, however, it is hardly likely that any more patents will be issued. The members of the Episcopal church in each colony will be left to govern themselves in the same way as all other denominations do, namely, as voluntary associations. The idea of a *legal* connection, shadowy as it has always been, with the church of England, will probably be given up. The connection of sympathy and identity of liturgical offices and doctrinal standards may remain as complete as ever.

“The United Church of England and Ireland in Canada,” as it calls itself,