inquire into the taxation of cooperatives. That commission reported only last fall. But in 1943, as I have shown, the taxation of cooperatives was being considered by the government and they were not too sure just what should be done. However, because a royal commission was appointed, because the government could not or would not make up its mind to recognize cooperative associations as cooperative associations and treat them justly accordingly, they spent two years on commission work. Now we have 1944, one of the biggest years of the wheat pools' operations, when after a series of very difficult years they were beginning to get on their feet, singled out for them to be taxed to the extent of possibly millions of dollars, and the collective savings of individuals are to be taken out of the wheat pool treasury to satisfy the uncertainty of a government which could not or would not make up its mind as to what is a cooperative and what is not.

Mr. ILSLEY: May I ask the hon. gentleman a question? He understands, does he not, that we are not providing by legislation for the taxation of the pools in 1944 and 1945, that we are not doing anything retroactive whatever, and that it is open to the pools, if they feel that they are not subject to taxation, to take the case to the courts, if necessary to the privy council?

Mr. BENTLEY: In reply to the minister's question, I understand that there are some very good features up to and ending in 1943 —not good enough but fairly good. I say that there should be legislation. The minister is putting it up to the pools. He says, in effect, that if they are not satisfied they can go to the courts. The government has held them up for two years, and now it is telling the wheat pools that they may go and fight their case in the courts. In the meanwhile the United Grain Growers and other elevator companies may have laid aside reserves to meet such a possibility as this; they are going to reap the benefit if the pools win in the courts, and they will suffer nothing if the pools lose. The pools are going to fight the battle for them.

Mr. DEPUTY SPEAKER: I am sorry to interrupt the hon. member but his time has expired.

Mr. BENTLEY: If hon. members will consent, I shall be only eight or nine minutes more.

Mr. DEPUTY SPEAKER: With the unanimous consent of the house only, the hon. member can continue.

Some hon. MEMBERS: Go on.

Mr. BENTLEY: Through you, Mr. Speaker, I should like to thank the house for its indulgence. I claim that this is nothing more or less than a raid on the treasury of an organization composed of a lot of people who have been living for years in the low-income groups and have spent many strenuous days and nights in building up this organization, which has served them so well in the past and can serve them so well in the future.

Another point is this: the years 1944 and 1945, particularly 1944, represent the largest earnings the pools have ever had, in spite of the fact that in the former year they lowered the cost of handling grain in their country elevators below any figure which ever existed in the history of grain handling in western Canada, to my knowledge, which extends over a long time. Not only did they do that for their members, but the very fact that they lowered the handling charges in competition with private companies brought down the charges of the private companies, and every farmer who delivers grain to a country elevator in the three prairie provinces has benefited by that reduction. Now the government proposes to force them through the process of appealing to the courts or tax them on the savings they have made.

Mr. ILSLEY: Let me get the hon. member's position.

Mr. BENTLEY: The minister is using up my time.

An hon. MEMBER: It has nothing to do with your time.

Mr. ILSLEY: The house has given the hon. gentleman plenty of latitude. Is his position that there should be retroactive legislation exempting these pools from taxation?

Mr. BENTLEY: My position is that there should be no tax on the wheat pools from the time they started to exist until now.

Mr. ILSLEY: Even though the law is that they are taxable; is that right?

Mr. BENTLEY: I do not believe that the law is that they are taxable, and I have tried to demonstrate that the pools do not believe it either.

Mr. ILSLEY: Is the position then not this, that the courts can decide? My point is: the money is not the main thing in this case; the main thing is fairness of treatment as between taxpayers. Having the opinion of the Department of Justice before the government that these taxpayers, if they are taxpayers, are taxable, how can we ignore that without legislation retroactively exempting certain taxpayers from taxation, while we are col-