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Animal &
Plant Health
Agency

Policy for Authorisation of Food Competent Certifying Officers (FCCO) in Great Britain by the Animal and Plant Health Agency

May 2021¹

¹ Later revisions will also be dated

Version 2.1

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Due to the extensive revisions in this version, changes are not highlighted in yellow.
The document should be read in its entirety.

Definitions

1. For the purposes of this document the following definitions shall apply:
 - a. **Agency** means the Animal and Plant Health Agency, an executive agency of Defra.
 - b. **Authorisation** means official recognition by the Agency to carry out official export health certification on behalf of Defra and the devolved administration Ministers, as appropriate. Authorisation is denoted by the allocation of a stamp with a unique number and inclusion on the definitive list of Food Competent Certifying Officers (FCCOs), held and managed by the Agency.
 - c. **Central Competent Authority (CCA)**, for the purposes of export certification, means Defra and its executive agency, APHA, in relation to any international trade functions for animals and animal products as reserved to the UK Government. It extends to representing the UK and any devolved administration in negotiations relating to animal health and public health certification of imports and exports. However, Central Competent Authority (CCA) also means the devolved administrations of Scotland, Wales and Northern Ireland in relation to other matters of animal health and welfare and where they are responsible for the implementation and execution of certification of animal products and animals.
 - d. **Competent Authority (CA)** includes the Local Authority (LA) responsible or authorised to implement and enforce food hygiene controls and animal health and welfare legislation, as specified in such legislation.
 - e. **Certifying Officer (CO)** - Means any person authorised to sign officially issued export health certificates on behalf of the appropriate CCA.
 - f. **Day** means a day in the calendar, including Saturday, Sunday, bank and public holidays.
 - g. **Export Certificates** are paper or electronic records, which denote and attest to attributes and the origin(s) of a consignment of goods to which they relate, verified by the person or authority making the record.
 - h. **Official Export Health Certificates (EHC)** are export certificates issued by, or under, the control of the exporting country's CCA, including by a certifying body recognised by the CCA to issue such certificates.
 - i. **Food Competent Certifying Officer (FCCO)** is a Certifying Officer authorised by the Agency, that has competencies to operate official controls under the Food Safety Act 1990 and means a person deployed by a competent authority, either as staff or otherwise, and who is appropriately qualified to perform official controls and other official activities in accordance with the Official Controls Regulation (2017/625), and any other relevant rules.
 - j. **Official Veterinarian** means a veterinarian authorised as an Official Veterinarian (OV) by the Agency.
 - k. **Lead Food Officer** means a person as defined by the relevant Food Law Code of Practice, or equivalent in the case of FSS.
 - l. **Local Authority authorised officer** means a person who has been authorised by a Local Authority (LA) according to the Food Law Code of Practice for the Country in which they are authorised under the applicable Food Safety Act 1990, in the context of their employment or contract and with responsibilities in relation to that Local Authority (LA).
 - m. **Notes for Guidance** means official guidance documents issued and specific to an EHC, providing explanation and information to aid and direct the exporter and Certifying Officer in the requirements and the completion of an EHC.

- n. **Official control** means any form of control that any appropriate Competent Authority performs for the verification of compliance with feed and food law, animal health and animal welfare rules.
- o. **OCQ revalidation** means periodically demonstrating that persons holding an Official Controls Qualification (OCQ) still have the relevant knowledge and understanding for their authorisation as a FCCO to continue a further period of time.
- p. **Products of Animal Origin (POAO)** means products derived from animals for human consumption and includes legally defined living animals ready to be presented to the final consumer for human consumption.
- q. **Revocation** means the withdrawal of authorisation to act as a certifying officer on behalf of the CCA in relation to official export health certification.
- r. **Suspension** means the temporary withdrawal of authorisation to act as a certifying officer on behalf of the CCA in relation to official export health certification, pending the outcome of a specified process and/or action.
- s. **Verification** means checking by examination in person or, if permitted, by deploying a Certification Support Officer (CSO) acting under the direction of the certifier, and considering objective evidence, to determine whether the specified requirements of a certificate have been fulfilled or complied with.
- t. **Working day** means a day that is not a Saturday, Sunday, bank, or a public holiday.

Introduction

2. This Policy sets out the relationship between the Animal and Plant Health Agency (hereafter referred to as 'APHA') and the person authorised as a Food Competent Certifying Officer (FCCO) by APHA. APHA designates FCCOs through this Policy for Authorisation.
3. APHA acts on behalf of the relevant Ministers in England, Scotland and Wales to designate individuals who may then carry out specific tasks in relation to official export certification on behalf of those Ministers.
4. Authorised persons are titled 'FCCO' but may also be referred, alongside Official Veterinarians (OVs), with the generic term as Certifying Officers (CO). A CO may provide official export health certification in relation to products of animal origin (POAO) and composite products as permitted by the country or trading zone of destination and as indicated on the official Export Health Certificate (EHC) for a commodity. Many certificates use the title 'Official Inspector' and this is interchangeable with CO, therefore a CO may sign such certificates
5. Official EHCs are officially negotiated and agreed between the central competent authorities (CCAs) of the trading countries and carry the backing of the state when used to certify exports. A FCCO is not empowered to negotiate an official EHC directly with the CCAs of importing countries and this activity is reserved to Defra on behalf of the UK. Official EHCs have specific requirements and may not be altered by the CO except where this is expressly permitted or required in the Notes for Guidance (NFG) that accompanies the certificate, or as otherwise permitted in writing by the CCA.
6. In order to facilitate the effective implementation of GB official controls and for the execution of export certification, COs must inspect and certify processes, commodities and consignments. They must take into consideration the specific requirements on the EHC, the NFG that accompany the EHC and the collective knowledge from official control systems in the UK, e.g. rapid alert systems, official disease freedom status and local authority inspections and enforcement, before issuing certification.
7. The FCCO shall operate in accordance with the standards for authorised persons who carry out official controls. These standards are laid down in relevant GB legislation, including retained EU legislation, particularly the Official Controls Regulation 2017/625.

The World Organisation for Animal Health (OIE) and Codex Alimentarius Commission (Codex) also set standards for the authorisation and conduct of officials in relation to the certification of animals and animal products and food for international trade. This is detailed in Section 3 of the OIE's Terrestrial Animal Health Code (Annex II) concerning the quality of veterinary services for member countries and in guideline [CAC/GL 38-2001](#) of the Codex on the issuance and use of official certificates.

Authorisation

8. APHA will authorise as an FCCO any person who:
 - i. Holds a recognised qualification, demonstrating their skills and knowledge to undertake official controls according to the Food Law Code of Practice for the country in which they are authorised to act, namely:
 - a Diploma in Environmental Health awarded by the Royal Environmental Health Institute of Scotland (REHIS); *or*
 - b Certificate of Registration as an Environmental Health Practitioner awarded by the Environmental Health Registration Board (EHRB) (including its antecedents and replacement); *or*
 - c Higher Certificate in Food Control (HCFC) awarded by the Environmental Health Registration Board (EHRB); *or*
 - d Higher Certificate in Official Control (HCOC) awarded by the Scottish Food Safety Officer's Registration Board (SFSORB); *or*
 - e Advanced Professional Certificate in Food Hygiene and Standards Control awarded by CIEH (Chartered Institute of Environmental Health); *or*
 - f Other qualification deemed to be equivalent by their recognized Professional Body (Annex I).

and
 - ii. Is employed or contractually engaged by either:
 - a a Local Authority in GB and authorised according to the Food Law Code of Practice, for the inspection and execution of official food hygiene controls; *or*
 - b Food Standards Scotland (FSS) and deemed competent to carry out the role of FCCO;

and
 - iii. Has read and declared that they have understood the Joint Working Group on Export Certification Guidance on Export Certification, *and*
 - iv. Has had their contact email address and eligibility criteria verified to APHA by their Lead Food Officer; *and*,
 - v. Is regarded by APHA as suitable for carrying out tasks on behalf of Ministers, taking into account any previous performance as an official.
9. By exception APHA may also decide to authorise persons based on relevant previous experience, training and performance, on a case-by-case basis and in direct discussion with the responsible Lead Food Officer.
10. LA Lead Food Officers/FSS Senior Managers must complete an Application for Authorisation of Local Authority Officers in Great Britain to Certify Exports to the EU (ET180)/Application for Authorisation of Food Standards Scotland (FSS) Food Competent Certifying Officers (FCCO) to Certify Exports of Products of Animal Origin (POAO) to the EU and Other Countries (ET208) with the details of persons working for their LA/FSS who need a FCCO authorisation and can meet the required criteria. The form must be sent by post or email to APHA (see details on the form).

11. Applicants and authorised FCCO's must report any criminal convictions to APHA immediately. The Agency will then consider whether the FCCO authorisation can continue.
12. A decision on whether authorisation can be granted shall be executed by APHA within ten working days of receiving all the required information from the Lead Food Officer.
13. Once authorised, the FCCO shall be included in the definitive list of officially authorised COs on APHA's register.
14. At no time shall a FCCO be considered an Agency member of staff or an employee of the CCA.
15. Authorisation will initially be for an unspecified period until an appropriate OCQ(FCCO) training module is available. Once this is available, a FCCO will be required to revalidate their authorisation every four years. FCCOs will be given adequate notice and opportunity to revalidate their authorisation. If an authorised FCCO does not undertake the training module within a reasonable period of time, then their authorisation will be revoked as 'lapsed'. The APHA FCCO authorisation register shall be updated accordingly by APHA.
16. APHA will issue an official stamp to each authorised person. The stamp shall bear a unique number assigned to that FCCO. The FCCO must stamp their assigned number where indicated on official EHCs and for any permitted alterations and deletions on the certificate. The use of this stamp is currently limited to official EHCs issued by APHA for export certification to the EU and supporting attestations within the UK to other Certifying Officers. However, it is intended that this stamp will become the default stamp for other official EHCs issued by APHA in due course to non-EU countries, and further guidance will be provided.
17. All official communication to an individual in relation to authorised status will be via the email address that is supplied to APHA on the application for authorisation form. It is a condition of the authorisation that any changes to contact details are notified to APHA by the FCCO.
18. If such circumstance arises that an FCCO wishes to move from one Local Authority's employment to another, their FCCO authorised status will stay with them (as long as all conditions for authorisation are met). Similarly, FCCO's can work temporarily for a different LA at the agreement of both LA's involved. The FCCO must notify APHA of the move which must be confirmed by the Lead Food Officer at the new LA. The FCCO can continue to use their existing stamp while working for the new LA. Moves between FSS and LA will be assessed on a case by case basis, subject to meeting specific requirements.

Performance of Tasks

19. Authorised FCCOs will act on behalf of the CCA when carrying out official export health certification, which must follow an EHC application by an exporting business via the Export Health Certificate Online (EHCO) system. COs may not use their FCCO authorisation status, number and stamp for any other accreditation, attestation or declaration that they may make personally, professionally or on behalf of their LA, whether in the context of compliance with Food Hygiene regulatory requirements or not. FCCOs providing supporting attestations to other COs (either OVs or other FCCOs), which rely on their authorisation status as an FCCO, must therefore do so in only their capacity as an authorised CO employed by the LA or FSS, and not in any personal capacity or as a private contractual agreement.
20. APHA will not supply any materials necessary for the performance of the FCCO role other than the issuing of an official stamp.
21. APHA will monitor the performance of all certifying officers that it has authorised as it sees fit through a range of checks and inspection activities including, but not limited to:
 - i. Analysis of data and copies of export certificates and supporting documentation

- ii. Investigation of complaints or observations, in particular, from officials at border control posts and reports from CCAs in importing countries.

Acting in an Official Capacity

22. Export related information, additions and amendments may be issued as necessary and it is essential that a FCCO refers to the latest information on the FCCO pages of Vet Gateway. It is the FCCO's responsibility to be up to date with all aspects relevant to their authorisation. As such, a FCCO must monitor their registered email address for communications from APHA.
23. An FCCO must keep up to date with any revisions to the Guidance on Export Certification.
24. An FCCO has responsibility for the security of all information obtained in the course of their duties, whether documentary, oral, pictorial, digital, or printed. All such data is considered personal and commercially sensitive data and may not be disclosed unless authorised under applicable sections of the UK General Data Protection Regulation and the Data Protection Act 2018. The unlawful disclosure of protected data shall be grounds for suspension or revocation of authorisation.
25. An FCCO must abide by the standards set out in the applicable Food Law Code of Practice (as applicable for the country in which the certification is undertaken), official communications whether direct or indirect and the NFGs issued with each EHC. Where a batch of certificates are held, the NFGs must be checked online for changes before issuing each certificate.
26. A FCCO must act without conflict of interest. This requirement underpins all official activities and reflects UK and international requirements. FCCOs should consider potential conflicts of interest and discuss with their Lead Food Safety Officer in order to make a decision on whether a conflict exists. In cases where questions over conflict of interest remain, the FCCO must refer to APHA for further consideration and advice. FCCOs should make a record of any potential conflict of interest and the advice received.

Revocation of Authorisation

27. The authorisation of a FCCO may be revoked for a number of reasons. These include:
 - i. If they no longer meet the criteria that allow them to be authorised by APHA in paragraph 3.1 or 3.3. *or*
 - ii. If a FCCO voluntarily requests their authorisation to be revoked, giving one week's notice in writing or by email to APHA from their registered address; *or*
 - iii. Following the final decision of a review panel or appeal outcome following any investigative process; *or*
 - iv. If they are convicted of a criminal offence that renders them unfit to be a FCCO.
28. If a FCCO has their authorisation revoked for any of the above reasons APHA will send a letter by email to their registered email address or office address giving full reasons for the action taken. The FCCO has a right of appeal against this decision as set out the appeals section of this Policy Document.
29. Stamps must be permanently destroyed or returned to APHA when authorisation is revoked.
30. In cases where concerns arise about the conduct of a FCCO, APHA will not revoke a FCCO authorisation without first carrying out an investigation.
31. The Lead Food Officer and LA of employment (or FSS) will be kept informed of all proceedings.

Suspension of Authorisation

32. The authorisation of a FCCO may be suspended in the following circumstances:
- i. If a preliminary report is made by any party that APHA considers serious enough to warrant an investigation, authorisation status may be suspended until such time as the investigation process is completed and the authorisation is restored or revoked, as the case may be;
 - ii. If APHA becomes aware of an investigation by a statutory body into the conduct of a FCCO and where such investigation concerns animal health, animal welfare, public health, acts of fraud or dishonesty or violence, which could affect the safe and effective performance of the FCCO or bring APHA or responsible Minister into disrepute;
 - iii. If there is evidence to suggest the FCCO is unable to undertake the safe and effective performance of the FCCO duties due to physical or mental impairment;
 - iv. If, in APHA's opinion, a FCCO infringes or fails to comply with official instructions or consistently performs official tasks unsatisfactorily;
 - v. In case of a breach of any requirement provided for in this policy, such as unlawful disclosure of data.
 - vi. Any other circumstance provided for in this policy.
33. A FCCO who is suspended shall not continue to exercise the role of an authorised FCCO. The suspended person must surrender their stamp to their lead food officer or APHA, in person or by recorded delivery, until such time as any investigation process is completed and authorisation is restored or revoked, as the case may be.
34. The Lead Food Officer and LA of employment (or FSS) will be kept informed of all proceedings.

Investigation

35. Investigations pursuant to any potential breach of the terms of this Policy for the Authorisation of a Food Competent Certifying Officer (FCCO) shall be conducted in accordance with the following:
- i. A sole investigator, who is an employee of APHA and a Grade 6 or Grade 7 Senior Veterinary Manager or an employee of the FSS or LA with equivalent seniority, will be appointed to carry out and complete an investigation without unreasonable delay;
 - ii. The investigator shall notify the FCCO in writing of the terms of the allegation and request a relevant account from the FCCO in writing or in person. Such notification shall be sent to the FCCO's registered email address;
 - iii. An investigation would normally include a meeting with the FCCO to enable them to present further evidence and explanation. However, in some cases the investigator may decide that this is not necessary. For example, in cases where the facts are beyond dispute (e.g. following admission in writing by the FCCO or following a legal conviction).
 - iv. The FCCO shall be given a minimum of five days' notice of the interview, which may be undertaken face to face or remotely using APHA security compliant options.
 - v. If the FCCO is requested to appear in person, they may be accompanied² to any interview or be represented at their own expense. They shall notify the investigator of the attendance of their representative no later than 72 hours before the appointed date of interview;

² This may be any person to accompany the FCCO and can be a Union representative or their Lead Food Officer.

- vi. APHA will treat all reports and other documents as confidential except that they may be shared with any other statutory body with a legitimate interest where such disclosure is authorised under relevant data protection or other legislation or if criminal action or intent is evident or suspected.
- 36. The investigator may interview such parties as they consider fit and shall make reasonable attempts to interview persons suggested by the FCCO who are considered to be relevant to the allegation made. Should the investigator fail to interview parties suggested by the FCCO, the investigator shall give reason for such failure in any report produced.
- 37. The FCCO shall cooperate with any reasonable request to assist the investigation, including the production of documents or attendance at an interview. Failure to comply will be considered as grounds for immediate suspension of authorisation.
- 38. At any point in time if, in the opinion of a Senior Veterinary Manager (not below Grade 6), there is sufficient evidence or concern that during the period of investigation the FCCO may continue to undertake their official role in non-compliance with this policy, or that doing so may bring the UK system of controls into disrepute the FCCO's authorisation will be suspended.
- 39. The FCCO will be given a draft of the investigator's report by email and invited to correct any factual errors or to make any relevant comments. The FCCO will have ten working days to do this and will be expected to respond by email to the person appointed to receive such communication. Upon request, APHA may grant extra time to the FCCO to review the report if there is reasonable justification provided the request is received in writing before the expiry of the ten working day period.
- 40. The investigator may decide that there is insufficient evidence to substantiate the alleged misconduct and recommend to the APHA Grade 6 Senior Veterinary Manager that the case is closed. If the Senior Veterinary Manager agrees they will write to the FCCO informing them of this.
- 41. The final report shall be forwarded to a review panel and copied to the Veterinary Director.
- 42. The Lead Food Officer and LA of employment (or FSS) will be kept informed of all proceedings.

Decision of the Review Panel

- 43. A review panel will be set up comprising two members, at least one of whom shall be an Agency MRCVS of Grade 6 and the other an official permanently employed by either APHA, FSS or LA at a suitable level of seniority (equivalent Grade SEO or above). The investigator will not be a member of the review panel.
- 44. A member of the review panel will invite the FCCO to a review panel meeting, which will usually be carried out face to face but may be carried out remotely. The FCCO will be given at least five working days' notice of the date of the meeting. The FCCO will be invited to make representations and given the opportunity to present any relevant mitigating factors. The FCCO may do this orally at the meeting or in writing before the meeting. No expenses will be payable to the FCCO for attendance at this meeting.
- 45. The FCCO may be accompanied at the review meeting but the cost of their representative attending the meeting will be at their expense. The FCCO must notify the member of the review panel who invited them to the meeting, that they will be accompanied by a representative no later than 72 hours before the appointed date of the interview.
- 46. The review panel shall consider the investigator's report as well as any representations made by the FCCO at the hearing or in writing, when making their deliberations.
- 47. The review panel will normally make a decision within five working days of the hearing. The findings and decision will be immediately reported to the FCCO in writing, sent to their registered email address.

48. The review panel may decide on one or more of the following outcomes in proportion to their findings:
- i. The panel finds in favour of the FCCO and no further action is required or, if they were suspended, their authorisation is restored;
 - ii. Written advice given to the FCCO;
 - iii. Suspension (or further suspension) of APHA authorisation pending retraining at the FCCO's expense;
 - iv. Revocation of authorisation for a period of up to five years;
 - v. If applicable, referral to a relevant professional or membership body, where there are grounds for concerns as to professional conduct;
 - vi. Additional conditions such as undergoing retraining, or working under the direct supervision of a named Lead Food Officer or named FCCO for a specified period of time;
 - vii. invalidation of relevant output where the review panel is sufficiently concerned that the FCCO has not acted appropriately in performing the specific task.
 - viii. Referral to the police if there is evidence that fraudulent or criminal acts may have been committed;
 - ix. Any other reasonable action that APHA considers necessary, including disclosure of their findings to the employer of the FCCO.
49. In determining the outcome of the investigation the review panel will consider previous training, performance and conduct as well as the facts of the specific case. Professional misconduct and intentional or repeated noncompliance with FCCO procedures would justify a long period of suspension.
50. If the review panel decides that it is necessary to revoke the authorisation of a FCCO and there has been a similar incident within the previous five years then they will normally decide on refusal to authorise for five years from the date of the decision.
51. The review panel will send copies of all their documents to the relevant Local Authority (or FSS as appropriate), Veterinary Director, APHA OV Team and APHA Regulatory Affairs, Compliance and Enforcement (RACE) Team.
52. The review panel will notify the Lead Food Officer and LA of employment (or FSS), as registered on the CSO's training record, of the outcome.

Appeals

53. Appeals pursuant to the final decision of the review panel shall be conducted as follows:
- i. The appeal must be in writing and addressed to the APHA Veterinary Director; and sent by either email or letter to the following address:
APHA Corporate Correspondence@apha.gov.uk
or
Corporate Correspondence
APHA Weybridge
Woodham Lane
New Haw
Addlestone
Surrey
KT15 3NB

- ii. It must be received within 28 calendar days of the date of the review panel’s written communication detailing their findings and the outcome; and
 - iii. It must set out the grounds for appeal and include any relevant evidence.
54. The Veterinary Director may within 14 calendar days decide the appeal or on receipt of the appeal immediately appoint a Senior Veterinary Manager (not below Grade 6) who has not previously been involved in the case to decide the appeal on their behalf. The appointed person will have 14 calendar days to decide the appeal.
 55. Where the FCCO’s authorisation has been suspended or revoked then this will continue whilst the appeal is being considered.
 56. The decision of the Veterinary Director, or the person appointed by them, at appeal is final with regard to the authorisation.
 57. The Lead Food Officer and LA of employment (or FSS) will be kept informed of all proceedings.

Restoration of Authorisation

58. If authorisation has been suspended or revoked and the review panel or appeals decision permits restoration of authorisation, then the authorisation will be restored to the extent that their authorisation is still valid.
59. When a FCCO has had their authorisation revoked as result of an investigation and a review panel decides that they can reapply for their authorisation at the end of the period set (maximum five years), their application for re-authorisation has to be reviewed and approved by the Veterinary Director who will consider if following the period of removal they are now fit to be a FCCO.
60. Where a FCCO has been suspended pending investigation and the review panel decides that there is no case to answer then their authorisation will be reinstated automatically without referral to Veterinary Director.

Cessation of Authorisation

Resignation

61. If a FCCO resigns from authorisation a written or email confirmation must be sent to the Agency. If the FCCO decides to resume FCCO work, reapplication for authorisation will be required.

Retirement

62. If a FCCO intends to retire and no further work is to be carried out on behalf of the Agency they must provide written or email notification to the Agency.

Death of FCCO during Appointment

63. Upon notification that a FCCO has died the Agency will:
 - update the Agency list of authorised officers and
 - request that the Official Stamp is returned or seek assurance that it has been destroyed.

Annex I - Recognised Professional Bodies

England and Wales	Chartered Institute of Environmental Health (CIEH)
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Scotland	Royal Environmental Health Institute of Scotland (REHIS)
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Annex II - OIE Terrestrial Animal Health Code

Section 3. Quality of Veterinary Services

Chapter 3.1 Veterinary Services Article 3.1.1.

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The same fundamental principles should apply in countries where the responsibility for establishing or applying certain animal health or animal welfare measures, or issuing some international veterinary certificates, is exercised by an organisation other than the Veterinary Services, or by an authority or agency on behalf of the Veterinary Services. In all cases, the Veterinary Services retain ultimate responsibility for the application of these principles.

These fundamental principles are presented in Article 3.1.2. [of the Terrestrial Animal Health Code].

APHA is an Executive Agency of the Department for Environment, Food and Rural Affairs and also works on behalf of the Scottish Government, Welsh Government and Food Standards Agency to safeguard animal and plant health for the benefit of people, the environment and the economy.