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- 1 Consumers' behaviour in quantitative microbial risk assessment for pathogens in raw milk:
- 2 incorporation of the likelihood of consumption as a function of storage time and temperature
- 3
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1 ABSTRACT

Foodborne disease as a result of raw milk consumption is an increasing concern in Western countries.
Quantitative Microbial Risk Assessment (QMRA) models have been used to estimate the risk of illness
due to different pathogens in raw milk. In these models, the duration and temperature of storage
before consumption have a critical influence in the final outcome of the simulations and are usually
described and modelled as independent distributions in the Consumer Phase Module (CPM).

7 We hypothesize that this assumption can result in the computation, during simulations, of extreme 8 scenarios that ultimately lead to an overestimation of the risk. In this study, a sensorial analysis was 9 conducted to replicate consumers' behaviour. The results of the analysis were used to establish, by 10 means of a logistic model, the relationship between time-temperature combinations and the 11 probability that a serving of raw milk is actually consumed.

12 To assess our hypothesis, two recently published QMRA models quantifying the risks of listeriosis and salmonellosis related to the consumption of raw milk were implemented. Firstly, the default settings 13 14 described in the publications were kept, secondly, the likelihood of consumption as a function of the 15 length and temperature of storage was included. When results were compared, the density of computed extreme scenarios decreased significantly in the modified model, consequently, the 16 17 probability of illness and the expected number of cases per year also decreased. Reductions of 11.6% 18 and 12.7% in the proportion of computed scenarios in which a contaminated milk serving was 19 consumed were observed for the first and the second study respectively. Our results confirm that 20 overlooking the time-temperature dependency may yield to an important overestimation of the risk. 21 Furthermore, we provide estimates of this dependency that could easily be implemented in future 22 QMRA models of raw milk pathogens.

24

23 *Keywords* Raw milk; quantitative microbial risk assessment, consumer behaviour, milk spoilage

25 1. INTRODUCTION

Probabilistic modelling is becoming established as one of the main tools to inform risk management decisions with regard to foodborne hazards. Quantitative Microbial Risk Assessment models (QMRAs) are increasingly applied to scenarios involving established and emerging food safety hazards as risk analysis becomes standard practice to manage food safety and ensure that regulatory decisions about foods are science-based and transparent (FAO, 2007; WHO/FAO, 2010).

One of the most significant examples from the public health perspective in recent years has been the use of QMRAs to estimate risks associated with the consumption of unpasteurized milk. Growing interest on raw milk consumption by some groups of consumers and an increasing number of foodborne incidents in which raw milk has been identified as the source, have lead agencies such as the UK Food Standards Agency (FSA), the European Food Safety Authority (EFSA) or the US Centres for Disease Control (CDC) to conduct consultations and issue scientific opinions on the risk posed by milkborne hazards (CDC, 2014; EFSA, 2015; FSA, 2014).

38 The public health risk related to consumption of raw milk is a particularly relevant (and debated) topic. 39 Raw milk can contain human pathogens which can be inactivated by appropriate heat treatment 40 (pasteurization or sterilization). However, the perception of raw milk as a "more natural" product has 41 led to a number of consumers opting for raw as opposed to heat-treated milk. In light of this trend, 42 models have been developed in recent years to assess probability of exposure or infection by 43 pathogens such as Salmonella, Listeria monocytogenes, Campylobacter jejuni, E. coli O157 or 44 Staphylococcus aureus as a result of raw milk consumption (Giacometti et al., 2015; Giacometti et al., 45 2012; Heidinger et al., 2009; Latorre et al., 2011).

46 QMRA models aimed at assessing the risk from farm-to-table include a consumer phase module (CPM), 47 a stage of the model that occurs at household level, where the food is no longer controlled by 48 professionals and where control of storage conditions or application of sufficient heat treatments 49 cannot be enforced by legislation (Nauta & Christensen, 2011). In QMRAs related both to pasteurized 50 or unpasteurized (Koutsoumanis et al., 2010) raw milk, the time and temperature of storage in the 51 CPMs are usually described and modelled as independent distributions. Time and temperature are the 52 most important parameters that regulate microbial growth in milk and are regularly identified in 53 sensitivity analysis as the factors with greatest effect on the model output (Koutsoumanis et al., 2010; 54 Latorre et al., 2011).

55 When both, storage time and temperature, are modelled as independent probability distributions 56 (most often Triangular or Pert) there will be instances during simulations in which values from the tails 57 of the distributions are sampled together yielding scenarios with high bacteria concentration at the 58 time of consumption. An implicit assumption underlying the cited models is that 100% of the computed 59 scenarios will result in milk being consumed, whatever the time-temperature combination is. However, 60 in reality some time-temperature combinations are unlikely to result in milk being consumed as it 61 would be perceived by the consumer as unsuitable (raw milk stored at high temperature for extended 62 periods might be spoiled and thus not actually consumed). Therefore, given that in microbial Dose-63 Response models the probability of illness is directly dependent to the number of bacteria ingested 64 per serving (i.e. each bacteria has the same probability to generate infection), the amount of simulated scenarios under extreme conditions may have a significant impact on the final output. 65

This limitation was already highlighted by Latorre *et al.* (Latorre et al., 2011) who noted that some correlation between these variables may exist and that without any restriction, the model cannot take into account that some extreme scenarios may not occur or end with milk not being consumed. However, to our knowledge, this limitation and the effect that this assumption may have on model output have never been formally assessed.

Following these considerations, the objectives of this work were to (i) model the dependencies between time and temperature in order to express the likelihood for a raw milk serving to be actually consumed for any computed storage time-temperature combination and (ii) assess the extent to which this dependency would affect the output of a QMRA model. To this end, results of a simplified sensorial analysis on raw milk stored for five days at different temperatures were used to estimate the probability that at given time-temperature combinations, the milk is spoiled, recognized as such, and thus not consumed. The potential effect of the estimated timetemperature relationship on model output was than evaluated by its inclusion in two recently published QMRAs of raw milk consumption and comparing published results with those of the modified model.

81 2 MATERIAL AND METHODS

82 2.1 Raw milk sample collection for sensorial analysis

A total of 1.5 L of raw milk was collected from 30 automatic vending machines (AVMs) in Lombardy by the public veterinary services, univocally coded, placed in cold boxes at 5°C±3 and taken to the laboratory within 30 min. Upon arrival, five aliquots of 200 mL were obtained from each sample and kept in different isothermal conditions at 3°C, 5°C, 8°C, 12°C, and 16°C for five days (temperatures were chosen to reflect the range of temperatures at which the domestic refrigerators can be expected to operate).

89 A total of 500 mL from each sample were used to test the samples for: pH, somatic cell count (SCC), 90 Lactic Acid Bacteria (LAB) Total Mesophilic Flora (TBC), enterobacteriacee (EB) and the major 91 pathogens to ensure operator's safety. An instrument with automatic temperature compensation 92 (HANNA instrument HI9321) was used for pH measurement; SCC was determined by an 93 Optofluorimetric accredited internal method MP02/063 (Fossomatic, Foss Electric, Hilleroed, DK); the 94 ISO standards ISO4833-2, ISO21528-2 and ISO16649-2; were used for surface plate enumeration of 95 TBC, EB and E. coli, while the standards AFNOR BRD 07/10 and AFNOR BRD 07/06 were used for PCR 96 REAL-TIME detection of L.monocytogenes and Salmonella. Enumeration of LAB was performed by the 97 accredited internal method MP01/048 (decimal dilution and plating in MRSA agar plate incubated 98 under microaerophilic condition at 37±2°C for 72±2h and decimal dilution and plating on M17 agar 99 plate at 37±2°C for 48±2h for enumeration of *Mesophilic Lactic Flora and Lactococci* respectively. The

100	accredited	internal	method	(MP	09/135)	was	used	to	test	the	samples	for	the	presence	of
101	Campyloba	cter jejun	i by PCR I	REAL-	TIME (Car	npylo	bacter	r Kit	(Bio-	Rad)).				

102

103 2.2 Sensorial analysis

To replicate consumers' behaviour, a simplified descriptive sensorial analysis of the milk samples stored at different temperatures was performed. The evaluation was carried out independently by two internal panellists experienced with sensory evaluation of milk¹. Descriptors used in the evaluation sessions were selected following consultation with the panellists and based on their experience and the scope of the analysis (Table I).

109

Table I Descriptors used in the sensorial analysis of raw milk samples stored at different time/temperature combinations.

	Description	Score
	None	1
Aroma	Acid aroma perceived when poured from the bottle	2
-	Acid aroma perceived immediately at the opening of the bottle	3
	Milk appears homogeneous when observed through the bottle.	
	When poured from the bottle, milk appears smooth without any	
	visible flake or residual on the bottle surface.	
<u>ہ</u>	Milk appears homogeneous when observed through the bottle.	
Texture	Small flakes are observed on the surface. Small flakes adhered to	2
	the bottle are clearly visible when milk is poured	
-	Milk in advanced coagulation phase, clear phase separation is	2
	observable through the bottle	3

¹ Experimental Zooprophylactic Institute of Lombardy and Emilia Romagna

Panellists were asked to evaluate all the milk samples every day at the same hour for five days. Each raw milk sample required the judgment of five subsamples per session (one sample for each temperature), thus, for practical reason, no more than five samples/week were processed and a total of six weeks were necessary to complete the experiment.

All the milk samples were presented in transparent plastic bottles and panellist were asked to spill the milk into glasses in order to simulate consumers' behaviour. As reference, a 500mL of fresh raw milk was also taken to the lab every day from the nearest AVM and presented to the panellists prior to each evaluation. Samples were presented in random order and panellists were asked to give their scores independently.

119 2.3 Data analysis

Following a conservative approach, the time at which a sample kept at a given temperature was considered 'spoiled' was the moment when at least one predictor was scored as 3 or both the predictors were scored as 2 or more.

Results from the panellists were analysed separately by means of binomial multiple logistic regression
 with time (h) and temperature (T°) as covariates:

125
$$logit(p_i) = ln\left(\frac{p_i}{1-p_i}\right) = \alpha + \beta_1 T^\circ + \beta_2 h$$
(Eq.1)

126
$$logit^{-1}(p_i) = \frac{e^{\alpha + \beta_1 T^\circ + \beta_2 h}}{1 - e^{\alpha + \beta_1 T^\circ + \beta_2 h}}$$
(Eq.2)

with *logit*¹(*p_i*) being the probabilities of the outcome events (i.e. the milk is considered spoiled and not
to be drunk by consumers). The potential interaction between time and temperature was tested by
comparing models with interaction term with those without the interaction term by means of the
Likelihood Ratio Test.

131 The Cohen's Kappa statistic for agreement was used to estimate the index of interrater agreement132 between the two panellists.

For inclusion in the QMRA model, the most conservative equation (i.e. the one that implies later detection of spoilage) was chosen; Statistical analysis was performed in R 3.1.2 (R Development Core Team, 2014) using packages 'Imtest' (Hothorn et al., 2009) and 'irr' (Gamer M, 2012).

136 2.4 Implementation of QMRAs

137 In order to evaluate the effect of including our estimates of association between time-temperature 138 combinations and likelihood of milk being spoiled (and as a result not consumed), the two most recently published QMRAs related to raw milk and indexed in PubMed were identified and reproduced 139 140 by using the Excel tool @Risk 6.3 (Palisade Corp.). The query: 'Quantitative Risk Assessment Raw Milk', 141 with the filter: 'published in the last 5 years' was used and 9 items were found (search date April 2015); 142 the two more recently published studies (from different authors) including a formal QMRA were selected. The more recently published studies were used without further consideration of their specific 143 144 formulation. Use of the most recently published studies rather than purposively selected QMRA was 145 considered the more transparent and sound approach to illustrate the potential effect and highlight 146 the relevance and timeliness of our proposal of incorporating time-temperature dependency in future QMRA. 147

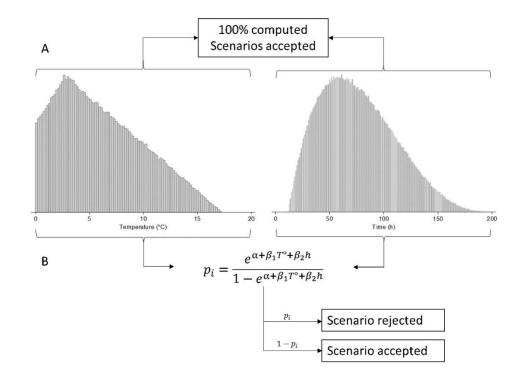
148 In the first work (Latorre et al., 2011), the risk of listeriosis due to raw milk consumption in the United 149 States was estimated for different scenarios and different susceptible population groups 150 (Intermediate-age, Perinatal/Pregnant woman, Elderly), the scenario related to raw milk purchased at 151 retail stores was chosen.

152 In the second (Giacometti et al., 2015), the risk of salmonellosis linked to consumption of raw milk sold 153 in vending machines in Italy was estimated for the best and worst storage conditions. The 'worst 154 conditions' scenario was selected (none heat treatment before consumption and worst storage 155 conditions).

Both models were reproduced as described by the authors, and results (Baseline1, Baseline2) were compared with the ones obtained by the modified models (Model1, Model2) in which the probability that the milk is actually consumed given the sampled values for the time-temperature pair, wasconsidered by including Eq. 2 (Figure 1).

160

- 161 Figure 1 Distributions describing the storage time and temperature assumed by Latorre et al. in QMRA related to risk of listeriosis
- 162 *due to raw milk in US. (A) in the original model all time-temperature combinations can yield a serving that could be consumed;*
- 163 (B) inclusion of eq. 2 implies that at any time-temperature combination the milk has a certain probability (pi) to be recognised as
- 164 spoiled by the consumer and thus not actually consumed.



165

In the first study, the probability of infection per serving (*p_{ill}*) was calculated assuming an exponential
 dose response model (WHO/FAO, 2004) and combining multiplicatively the probability of illness given
 the dose with the assumed overall prevalence of *L.monocytogenes* in raw milk:

169 $P = 1 - e^{(-rD)}$ (Eq.3)

 $170 p_{ill} = P * prev (Eq.4)$

where *P* is the probability of illness, *D* is the dose per serving (CFU per serving) and *r* is the parameter
describing the probability that one *L.monocytogenes* cell causes illness(WHO/FAO, 2004). Variable *P_{ill}*

173	is the probability of illness per serving and <i>prev</i> is the assumed prevalence of <i>L.monocytogenes</i> in raw
174	milk (proportion of raw milk positive servings). Thus, in Model1, p_{iii} was estimated as:
175	$p_{ill} = P * prev * (1 - p_i) $ (Eq.5)
176	where the correction factor $(1-p_i)$ expresses the probability that the serving is actually consumed
177	according to time and temperature.
178	In the second QMRA, the beta-Poisson relationship proposed by WHO/FAO (WHO, 2002) was used to
179	calculate p_{ill} for the ingested dose:
180	$p_{ill} = 1 - (1 + dose/b)^{-a}$ (Eq.6)
181	where <i>dose</i> is the ingested dose (CFU per serving), <i>a</i> and <i>b</i> are two coefficients described by triangular
182	distributions with parameters (minimum, most likely and maximum) 0.0763, 0.1324, 0.2274 and 38.49,
183	51.45, 57.96, respectively.
184	In Model2, p_{ill} was estimated by shifting the sampled dose to 0 according to:
185	$Bernouilli(p_i)$ (Eq.7)
186	In this way, rejected scenarios are not considered 'at risk scenarios' by the model. For both models, as
187	described by the authors, the number of expected cases per year (N_{exp}) were estimated by multiplying
188	p_{ill} by the number of servings per year.

190 **3 RESULTS**

191 *3.1 Analytical results*

192 The initial (Time 0) values for: pH, SCC, TBC, LB, and EB are presented in Table II.

- 193 Table II Analytical results (mean, standard deviation, minimum and maximum) of microbiological and chemical tests (pH, SCC,
- 194 TBC, LAB and EB) of raw milk samples collected from automatic vending machines in Lombardy (n=30) for purpose of sensorial
- 195 analysis; tests carried upon arrival to the laboratory.

Parameter	Unit	MIN	MAX	Mean	Std. dev	
рН	-log [H(+)]	6,69	7,7	6,9	0,28	-
SCC ¹	cells*ml ⁻¹	2000	371000	176367	100438	
TBC ²	log CFU/ml	3,38	5,04	4,24	0,48	
LAB ³	log CFU/ml	1,3	4,2	2,88	0,62	
EB^4	log CFU/ml	1	4,3	2,61	0,92	

- ¹Somatic Cell Count
- 197 ²Total bacteria count
- 198 ³Lactic Acid Bacteria
- 199 ⁴Enterobacteriaceae
- 200
- 201 No pathogens were found in any sample and no inhibitory substances were detected. According to 202 regional regulation (Lombardia, 2007), the microbiological and chemical quality of the samples was on 203 average good.
- 204

205 3.2 Sensorial analysis results

206 Results of the binomial multiple logistic regression analysis are reported in Table III. Only the results of 207 the models without interaction are presented as the inclusion of an interaction term did not 208 significantly improved the models.

Table III Coefficients of multiple logistic regression models for the association between the probability of raw milk being recognised as spoiled and the storage time-temperature combination. The regression curves were fitted to data from the evaluation of 30 samples of milk stored at different time-temperature combinations by two panellists. Results of each panellist (A and B) are reported independently. * indicates the equation coefficients selected to be included in QMRAs.

214

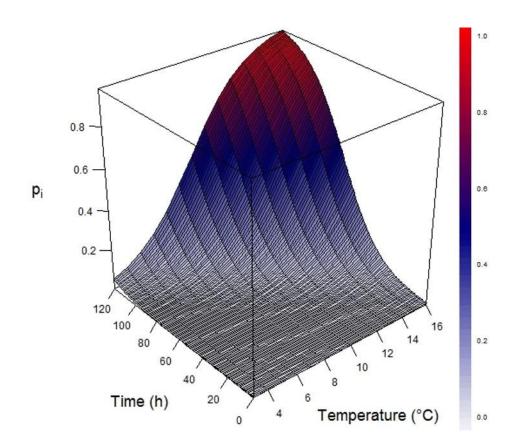
Equation	Independent variable	Coefficient	2.5%	97.5%
	Constant	-12.273	14.150	10.395
A*	Time (h)	0.4883	0.403	0.573
	Temperature (°C)	0.0661	0.054	0.078
	Constant	-13.004	15.025	10.983
В	Time (h)	0.5161	0.426	0.606
	Temperature (°C)	0.0718	0.058	0.085

215

216 With an overall interrater agreement of 99.44%, the K coefficient for agreement resulted 0.98, 217 confirming an excellent strength of agreement between the panellists.

As expected, the model predicted that when the storage time and/or the storage temperature increases, the probability for the milk to spoil and being recognized by the consumer as expired also increases (Fig.2). 221 Figure 2 Graphical representation of the modelled relationship between storage time and temperature on probability of milk being

222 perceived as spoiled (pi)



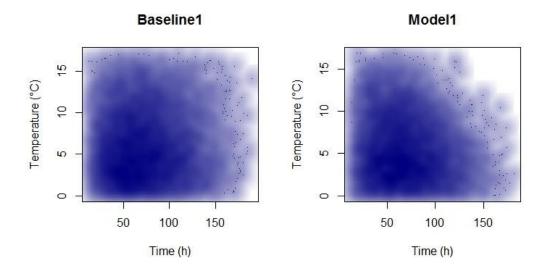
223

224 Implementation of QMRAs

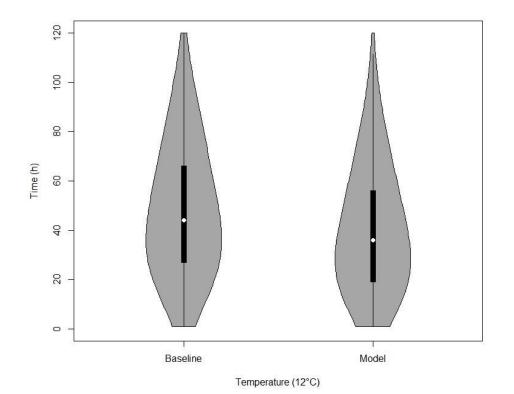
After 500,000 simulation of the first study (Baseline1) and according to an assumed prevalence of *L.monocytogenes* of 2.1%, 10,445 iterations (2,1%) yielded scenarios in which contaminated raw milk servings are ultimately drank by consumers, for the same study, 9,232 scenarios (1.8%) were predicted when the correction was applied (Model 1). An overall reduction of about 11.6% of scenarios ending with consumption of a contaminated serving was observed.

The same approach applied to the second study (Baseline2 Vs Model2), generated a similar difference (12.7%). The effect of this dependency is immediately evident when the densities of the sampled timetemperature pair combinations are compared between Baseline1 and Model1 (Figure 3) and between Baseline2 and Model2 (Figure 4). As expected, the most evident effects are noticed when the extreme time-temperature combinations are computed.

Figure 3 Retrospective density plot representing the density of the time-temperature pair combinations behind the computed scenarios characterized by presence of L.monocytogenes in raw milk servings. In Baseline1 the time-temperature dependency is not modelled, thus, the occurrence of Time-Temperature combinations only depends on the individual Time and Temperature distributions; In Model1, each sampled combination generates a specific probability of milk being recognized as spoiled and, ultimately, not consumed. A decrease in the intensity of the extreme scenarios in the Model1 with respect to Baseline1 (upper right corner) is evident.



- 243 Figure 4 Retrospective Violin density plot representing the density of the Time-Temperature (T° was fixed to 12°C in this study) pair
- 244 combinations behind the computed scenarios characterized by presence of Salmonella in a raw milk serving. A decrease in the intensity
- 245 of extreme scenarios can be observed in Model2 with respect to the Baseline2 approaching the violins' apex.



246

As a consequence, considering that: (i) the probability of illness per serving depends on the dose of the pathogen at the time of consumption (Eq.3, 6); (ii) the dose at the time of consumption depends on microbial growth and (iii) microbial growth is regulated by time and temperature; if extreme time and/or temperature scenarios are unlikely to result in consumption, (Fig.2) there is a direct effect of including Time-Temperature dependency on the number of expected cases N_{exp} (Table IV).

253 Table IV Probability of illness per serving and number of cases per year associated with consumption of raw milk. Results from

two published QMRAs with time and temperature as independent distributions (Baseline1, Baseline2) and with inclusion of time-

255 temperature relationship (Model1, Model2). The effect on the shape of the output distributions is mainly shown from the values

at 95th percentile.

257

Model	Probability of illness per serving Median (95th %ile)	Number of expected cases Median; (95th %ile)
Baseline1 ¹		
Intermediate	1,4 x 10 ⁻¹³ (3,9 x 10 ⁻⁸)	4,1 x 10 ⁻⁵ (14)
Perinatal	8,0 x 10 ⁻¹² (2,3 x 10 ⁻⁶)	2,0 x 10 ⁻⁵ (6)
Elderly	1,3 x 10 ⁻¹² (8,8 x 10 ⁻⁷)	1,0 x 10 ⁻⁴ (29)
Model1		
Intermediate	1,3 x 10 ⁻¹³ (1,1 x 10 ⁻⁸)	4,5 x 10 ⁻⁵ (4)
Perinatal	7,4 x 10 ⁻¹² (6,6 x 10 ⁻⁷)	1,9 x 10 ⁻⁵ (2)
Elderly	1,2 x 10 ⁻¹² (1,1 x 10 ⁻⁷)	9,3 x 10 ⁻⁵ (8)
Baseline2 ²	2.6 x 10 ⁻⁴ (1,4 x 10 ⁻²)	28558 (28838)
Model2	1,5 x 10 ⁻⁴ (1,0 x 10 ⁻ 2)	16243 (16455)

258

The effect of explicitly including in the model the probability of consumption $(1-p_i)$ as a function of the storage time and temperature on p_{ill} and N_{exp} was evident in Model1 at 95th percentile where: p_{ill} was reduced by about 3.5 times for the categories 'intermediate' and 'perinatal' and up to 8 times for the category 'elderly'; N_{exp} resulted 3.5, 3 and 3.6 times smaller with respect to Baseline1 for the categories 'Intermediate', 'Perinatal' and 'Elderly' respectively.

In Model2 the effect of modelling the time-temperature relationship was evident even on the median values were a reduction of 1.7 times with respect to results from Baseline2 were observed for both p_{ill} and N_{exp} .

268 4 DISCUSSION

Raw milk spoilage is a natural phenomenon, and the time at which it occurs depends on several factors such as the type and initial load of microbial contaminants, pH, enzymes, and time-temperature conditions.

The processes leading to modification of organoleptics properties of milk are time-temperature dependent; therefore, as for the majority of the fresh products, the spoilage occurs more rapidly if the product is not stored at low temperatures. Ignoring raw milk spoilage is a biological phenomenon that occurs in a few days if the product is not conserved properly. Ignoring spoilage of raw milk in QMRA models and therefore assuming that milk will always be consumed regardless of its organoleptic modifications during storage is not realistic and can have a significant impact on model outputs.

278 In this study we have demonstrated that overlooking the time-temperature relationship may result in 279 those scenarios in which contaminated raw milk servings are consumed being significantly 280 overestimated (by approximately 11.6 and 12.7% in the case studies we selected).

281 Coping with all the possible dynamics that might influence raw milk's spoilage, would require such level 282 of complexity that analytical solutions might not be possible. An alternative would be the incorporation 283 of a dependency such as the one described in our logistic model. Our equation simplifies the complex 284 dynamics that ultimately determine the spoilage of milk considering only the relationship between 285 storage time and temperature on likelihood of spoilage (and of consumption being adverted). It 286 provides, for the first time, a concrete and objective basis to explicitly include the logical relationship 287 between storage time-temperature combinations and likelihood of milk being consumed, that is: 'As 288 the storage conditions became extreme the likelihood of raw milk being perceived as spoiled 289 increases'.

For practical reasons, it will always be difficult to gather accurate information about storage conditions at household level or about consumers' behaviour; however, the proposed approach will mitigate the effect of too conservative assumed distributions. In fact, with the incorporation of the proposed 293 equation, if very conservative storage time and/or temperature distributions are used (i.e. more 294 extreme values are allowed), when high values are sampled, the predicted likelihood of milk being 295 perceived as spoiled will be high (Figure 2) and the amount of rejected scenarios will increase 296 consequently, mitigating the effect of conservative distributions. Conversely, if this dependency is 297 ignored, the effect of too conservative distributions might lead to alarming but poorly representative 298 risk estimates. With the inclusion of this equation, QMRAs for hazards in raw milk would be more 299 realistic and their outputs would not be inflated by ignoring the correlation between storage 300 conditions that favour microbial growth and likelihood of milk being perceived as deteriorated and 301 thus not consumed.

The probabilistic modelling of exposure to hazards present in raw milk should explicitly include this relationship. In the absence of more extensive empirical data on the relationship between storage conditions and perception of spoilage in milk from other sensorial evaluations, we believe it is reasonable for future studies to make use of the estimates provided in this study.

Considering that the main objective of probabilistic risk modelling in food safety is to represent what happens in the real world in order to provide science-based information to decision makers, our equation improves the current level of understanding, making it closer to reality by excluding consumption scenarios that would not occur in practice. Inclusion of the logistic equation presented in this study would be a simple, transparent and sound approach and an improvement with respect to previously used QMRAs of raw milk.

In many European countries raw milk can be sold at the farm directly to the consumer (EFSA, 2015) and in accordance to the current regime of hygiene rules adopted by the European Union in 2004, the so-called 'Hygiene Package' (Regulation, 2004a, 2004b), direct sale of milk is regulated by the national law of the member states and, in some cases, additional regulations at subnational level. Although some differences may exist in national or sub-national regulations, farms allowed to sell raw milk for human consumption are asked to comply with strict criteria and operate with high quality standards. Consequently, a substantial homogeneity in the microbiological and biochemical quality of *raw milk* for human consumption from different regions with similar regulations might be assumed, making the results presented in this paper more directly applicable to future QMRA models aimed to assess the risk for human health related to consumption of raw milk in different European countries.

322 However, if the raw milk characteristics, hygienic practices or regulations are likely to be significantly 323 different or subjected to high variability, the coefficients estimated in this study might not be 324 appropriate (e.g. milk produced in systems and geographic regions where the initial bacterial count 325 can be expected to be considerably higher). Furthermore, considering that the equation is aimed to 326 predict consumers' behaviour through a sensorial evaluation, the social context of the country where 327 the QMRA is to be implemented plays a critical role. In fact, the perception of 'suitability' might be 328 different due to a number of traditional and social factors; therefore, even the parameters used to 329 score the organoleptic characteristics should be revised accordingly.

Besides raw milk, our approach can be applied to other food products for which the storage conditions at household level are critical: raw meat and fish, eggs, vegetables, soft cheese, and fresh products in general which are all subjected to a fast deterioration if not conserved properly.

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