

1 Running head: pathogen growth on cheese

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3 Growth of *Listeria monocytogenes*, *Salmonella* spp., *Escherichia coli* O157:H7, and
4 *Staphylococcus aureus* on Cheese during Extended Storage at 25°C

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14 Key words: pathogen growth, cheese, storage, *Escherichia coli* O157:H7, *Salmonella*, *Listeria*
15 *monocytogenes*, *Staphylococcus aureus*, FDA Food Code

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19 *Submitted to the Journal of Food Protection. January 24, 2014

20 **ABSTRACT**

21 A potentially hazardous food (PHF) requires time/temperature control to maintain safety.
22 The US Food and Drug Administration would classify most cheeses as PHF based on pH and a_w ,
23 and a product assessment would be required to evaluate safety for >6 h storage at 21°C. We
24 tested the ability of 67 market cheeses to support growth of *Listeria monocytogenes* (LM),
25 *Salmonella* spp. (SALM), *Escherichia coli* O157:H7 (EC), and *Staphylococcus aureus* (SA) over
26 15-day storage at 25°C. Hard (Asiago and Cheddar), semi-hard (Colby and Havarti), and soft
27 cheeses (Mozzarella and Mexican-style) were among types tested, and included some reduced-
28 sodium and reduced-fat types. Single-pathogen cocktails were prepared and individually
29 inoculated onto cheese slices ($\sim 10^5$ CFU/g). Cocktails were comprised of 10 strains of LM, six of
30 SALM, or five of EC or SA. Inoculated slices were vacuum packaged and stored at 25°C for \leq
31 15 days, with surviving inocula enumerated every three days. Salt-in-the-moisture phase
32 (%SMP), calculated from measured moisture (%) and salt (%), titratable acidity (%), pH, and a_w
33 were measured. Pathogens did not grow on 53 cheeses, while 14 cheeses supported growth of
34 SA, six of SALM, four of LM, and three of EC. Of the cheeses supporting pathogen growth, all
35 supported growth of SA, ranging from 0.57 to 3.08 log CFU/g (avg. 1.70 log CFU/g). Growth of
36 SALM, LM, and EC ranged from 1.01 to 2.05 log CFU/g (avg. 2.05 log CFU/g), 0.60 to 2.68 log
37 CFU/g (avg. 1.60 CFU/g), and 0.41 to 2.90 log CFU/g (avg. 1.69 CFU/g), respectively. Cheese
38 pH and %SMP most affected pathogen growth, with pH having a dominant effect. Pathogen
39 growth/no-growth varied within some cheese types or lots. Except for Swiss-type cheeses, mold-
40 or bacterial-ripened cheeses, and cheeses made with non-bovine milk where insufficient data
41 exists, the pathogen growth/no-growth interface could be modeled and boundary conditions
42 established for safe, extended storage ($\leq 25^\circ\text{C}$) of cheeses based on pH and %SMP.

43 **INTRODUCTION**

44 Temperature-dependent storage of most cheeses has three major roles – to allow for
45 curing/ripening of cheeses that contain added or indigenous bacteria and enzymes, to prevent
46 quality defects, and to control pathogen growth (3). The 2009 US Food and Drug Administration
47 (FDA) Food Code (40) defines a potentially hazardous food as a food that requires
48 time/temperature control to limit the growth of pathogenic microorganisms or toxin formation. In
49 this publication, potentially hazardous foods are also designated as Time/Temperature Control
50 for Safety (TCS) foods. This latter designation has been adopted in the 2013 Food Code (45). In
51 both versions of the Food Code, foods with a pH of <4.2 and any a_w , or a_w of <0.88 and any pH
52 are not considered potentially hazardous. Foods considered potentially hazardous, unless shown
53 to be safe by a product assessment, fall into one of the following categories: $a_w \geq 0.88$ and pH
54 >5.0, $a_w > 0.90-0.92$ and pH >4.6, or $a_w > 0.92$ and pH >4.2. The Food Code indicates that TCS
55 foods must be maintained at $\leq 5^\circ\text{C}$, or, if placed outside refrigeration, can be stored for up to 6 h
56 at a temperature no greater than 21°C , after which the product must be discarded.

57 The composition of many cheeses, when evaluated using the Food Code criteria, places
58 them into the category of TCS foods, thus limiting the ability of retailers to market the cheeses
59 under room-temperature conditions which could enhance cheese flavor and aroma (12). The
60 Food Code-mandated time and temperature control may also limit industry flexibility in the
61 transportation, handling, and storage of cheeses. It has, however, been suggested that the
62 biochemical changes that occur during cheese ripening create an environment hostile for
63 pathogen growth, and that time/temperature control of some cheese is primarily needed to
64 maintain the organoleptic quality of cheese, not to maintain safety (3). Bishop and Smukowski
65 conducted a thorough review of the literature available up until 2006 and recommended that

66 cheeses meeting certain criteria, e.g. cheeses manufactured in the US with pasteurized or heat-
67 treated milk ($\geq 63^{\circ}\text{C}$ for ≥ 16 sec), cheeses manufactured following Good Manufacturing
68 Practices and under the principles of HACCP (Hazard Analysis and Critical Control Points), and
69 cheeses manufactured meeting standards of identity outlined in 21 CFR (Code of Federal
70 Regulations) part 133 (43), should be exempted from refrigeration requirements during ripening,
71 storage, shipping, and display (3). Bishop and Smukowski recommended that the following
72 cheeses could meet these criteria: Asiago (medium and old), Cheddar, Colby, Feta, Monterey
73 Jack, Muenster, Parmesan, Pasteurized process, Provolone, Romano, and Swiss/Emmentaler.

74 In order to establish whether a particular food, e.g. cheese, can be exempted from TCS-
75 requirements, the Food Code allows processors or retailers to conduct a microbial challenge
76 study in order to assess the ability of a food product to inhibit pathogenic bacterial growth or
77 inactivate these microorganisms. The Food and Drug Administration (FDA) has outlined
78 parameters for conducting such challenge studies (44).

79 When experts consider the major microbiological hazards across the food supply, the risk
80 of bacterial illness from dairy products such as milk and cheese can be attributed primarily to
81 *Listeria monocytogenes*, *Yersinia enterocolitica*, *Campylobacter* spp., and non-typhoidal
82 *Salmonella* spp. (2). Between 1990 and 2011, there were 105 reported foodborne illness
83 outbreaks in the US, with over 2000 illnesses, linked to cheese/cheese products in the US (11).
84 Pathogens linked to these cheese-related outbreaks included *Salmonella* spp. (37 outbreaks),
85 *Listeria monocytogenes* (16 outbreaks), pathogenic *Escherichia coli* (6 outbreaks),
86 *Staphylococcus aureus* (4 outbreaks), Norovirus (21 outbreaks), *Campylobacter* spp. (9
87 outbreaks), and *Brucella* spp. (5 outbreaks) (11). Among the 105 outbreaks, 17 were linked to
88 cheeses made with pasteurized milk, 30 were linked to cheese made with raw milk, and the

89 pasteurization status of cheeses involved in the remaining 58 outbreaks was unspecified. The
90 pathogenic bacteria primarily responsible for foodborne illness outbreaks linked to cheese
91 manufactured with pasteurized milk were *L. monocytogenes*, *Salmonella* spp., and *E. coli*
92 O157:H7. Cheeses implicated in these outbreaks included process cheese, Mozzarella, and
93 Mexican-style cheeses (7, 11). The low incidence of *S. aureus*-linked outbreaks related to cheese
94 is presumed to be due to the low incidence of this pathogen in pasteurized milk, and the growth
95 characteristics of this bacterium (21). However, *S. aureus* is commonly carried by humans and
96 thus could contaminate cheese during post-pasteurization handling (16). *S. aureus* is also the
97 bacterial pathogen considered to have the highest tolerance to reduced-moisture conditions or
98 increased salt concentration (22), and therefore could be considered a target pathogen in
99 determining the safety of cheese contaminated post-processing and stored for extended periods
100 of time at room temperature.

101 The goal of this project was to evaluate survival of strains of *L. monocytogenes*,
102 *Salmonella* spp., *E. coli* O157:H7, and *S. aureus* on natural market cheeses during extended
103 storage at 25°C, and to determine the effect of cheese compositional factors such as pH, a_w , and
104 %salt on pathogen survival. Pathogen-survival data from laboratory research and data from
105 published literature were then combined in order to model the boundary conditions for pathogen
106 growth / no-growth during storage of cheese at room temperature.

107

108 **MATERIALS AND METHODS**

109 **Cheeses.** Sixty-seven cheeses were purchased from local retail establishments or
110 obtained directly from the manufacturer and stored at 4°C. Cheeses studied were Asiago (aged,
111 young), Brick (2 brands), Cheddar (mild, regular, sharp), Cheddar-Mozzarella, Colby, Colby-
112 Jack, Farmer's, Feta, Gouda, Gruyere, Havarti (2 brands), Jack (goats' milk), Monterey Jack,
113 Muenster (2 brands), Parmesan, Pepper Jack (2 brands), Provolone (mild, regular; 2 brands
114 sharp), Provolone-Mozzarella, Queso Blanco, Queso Fresco, Queso Quesadilla, String cheese (2
115 brands), Swiss (Baby, 2 brands; Lacey, regular), reduced-fat cheeses (Cheddar, Colby-Jack,
116 Provolone) and reduced-sodium cheeses (Colby Jack, Provolone). Where a type of cheese was
117 tested more than once, tested cheeses were from different brands and/or from different
118 production dates of the same brand. All cheeses were manufactured in the United States from
119 pasteurized milk (Table 1, 2).

120 **Proximate analysis.** The cheeses tested in this study were characterized by % moisture,
121 % salt, and a_w at the beginning of each trial. Changes in both % titratable acidity (%TA) and pH
122 were anticipated over time; thus pH was measured on pathogen-inoculated cheeses at every
123 sampling time (days 0, 3, 6, 9, 12 and 15), and %TA was measured on un-inoculated cheeses on
124 days 0, 6 and 15. Duplicate trials were performed for each compositional analysis, and average
125 values were reported.

126 Moisture (%) was determined using a standard method (4) by drying a representative 3-g
127 sample at 100°C for 5 h in a vacuum oven maintained at -98kPa throughout the drying process
128 (M.D.O. Vacuum Oven, Model 3623, Lab-Line Instrument Inc., Melrose Park, IL). Salt (%) was
129 determined by titration of chloride using the silver titration standard method (4). For each trial, a

130 representative 5-g sample was diluted with distilled water 1:20 (w/v) and % chloride was
131 determined according to the standard method using a Model M926 Chloride Analyzer (Nelson
132 Jameson, Marshfield, WI). The % chloride content was automatically calculated by the analyzer
133 and expressed as mg%/liter of sodium chloride, which was converted to % salt by multiplying
134 the appropriate dilution and conversion factors. Salt (%) and moisture (%) of an individual
135 cheese sample were used to calculate % salt-in-moisture-phase (%SMP) using Equation 1:

$$136 \quad \%SMP = (\% \text{ salt} \times 100) / (\% \text{ salt} + \% \text{ moisture}) \quad (1)$$

137 Water activity (a_w) was determined for each cheese at the beginning of each trial using an
138 AquaLab LITE water activity meter (Decagon Devices Inc., Pullman, WA) according to a
139 standard method (1). Titratable acidity (%) was monitored during storage (days 0, 6, and 15)
140 according to a standard method (4). Briefly, for each cheese/trial, one sample (10.0 ± 0.5 g) that
141 had been manually crumbled was automatically blended with 50-ml distilled water and titrated
142 using a Model DL22 Automatic Titrator (Mettler Toledo, Schwerzenbach, Switzerland), which
143 was set to calculate % titratable acidity (%TA) using the molecular weight of lactic acid. To
144 determine the impact, if any, of the presence of inoculum bacteria or growth of indigenous
145 bacteria on cheese pH, the surface pH was measured for individual inoculated cheese slices at
146 each sampling time (days 0, 3, 6, 9, 12, and 15) using an Accumet AB15 pH meter equipped
147 with a flat surface combination electrode (Fisher Scientific, Itasca, IL).

148 **Inoculum preparation.** Ten strains of *L. monocytogenes*, six strains of *Salmonella* spp.,
149 five strains of *E. coli* O157:H7, and five strains of *S. aureus*, representing a wide variety of
150 sources and serotypes, were used in this study (Table 3). Stock cultures were maintained at
151 -20°C in brain heart infusion broth (BHIB; Difco, Becton Dickinson, Sparks, MD) with 10%

152 (wt/vol) added glycerol (Fisher). Fresh working cultures were prepared monthly by thawing
153 stock cultures and streaking for isolation as follows: *L. monocytogenes* on Listeria Selective agar
154 (LSA; Oxoid, Ogdensburg, NY) with added Listeria Selective Supplement (Oxford formulation,
155 Oxoid), *Salmonella* and *E. coli* O157:H7 on modified Levine's Eosin Methylene Blue agar (m-
156 LEMB), prepared from lactose-free LEMB agar (Difco) with the addition of 10 g/liter D-sorbitol
157 (Fisher) and 5 g/liter NaCl (Fisher); and *S. aureus* on Baird-Parker agar (BP; Difco) with added
158 egg yolk Tellurite enrichment (Difco). Working culture plates were incubated for 24 h at 35°C
159 for *Salmonella* spp. and *E. coli* O157:H7, and 48 h at 35°C for *L. monocytogenes* and *S. aureus*,
160 whereupon all cultures were observed for consistent colony morphology and stored at 4°C for
161 <40 days. Inoculation cultures were prepared for individual strains by transferring a single
162 colony of each strain into a separate tube containing 9 ml of Nutrient broth (NB; Difco) for *L.*
163 *monocytogenes*, or BHIB for *Salmonella* spp., *E. coli* O157:H7 and *S. aureus*. Preliminary
164 cheese challenge studies showed better survival of *L. monocytogenes* over 15 days at 25°C on
165 Cheddar and Swiss cheeses when inocula had been grown in NB, while the other three pathogens
166 survived better on cheeses when inocula had been grown in BHIB (n=2, data not shown).
167 Following incubation for 20 to 24 h at 35°C, 1 ml of stationary-phase culture of each strain for a
168 designated pathogen (10^8 CFU/ml for *L. monocytogenes*, and 10^9 CFU/ml for *Salmonella* spp., *E.*
169 *coli* O157:H7, and *S. aureus*) was transferred to a sterile 9-ml tube to produce a single-pathogen,
170 multi-strain cocktail. Each pathogen cocktail was mixed by vortexing and diluted, as necessary,
171 to produce a starting inoculum cocktail of 10^7 CFU/ml. Pathogen levels in the cocktails were
172 estimated by plating the inocula on brain heart infusion agar (BHIA; Difco) and incubating at
173 35°C for 24 h.

174 **Sample inoculation.** The working surface of a biosafety cabinet was sterilized with 70%
175 (v/v) ethanol and covered with aluminum foil prior to cheese inoculation. Cheese slices (approx.
176 25-30 g, approx 70-80cm²) were placed on the aluminum foil aseptically, six cheese slices per
177 trial. An aliquot (0.1ml) of a single-pathogen cocktail (10⁷ CFU/ml) was pipetted onto each of
178 the six cheese slices. An L-shaped spreader was used to evenly distribute the inoculum over the
179 surface of the six slices, then samples were left to air-dry under the hood for 15 min to allow
180 bacterial attachment and evaporation of excess liquid. The a_w values of control and air-dried
181 inoculated samples were not significantly different (n=3; p>0.05; data not shown). Inoculated
182 cheese slices were folded into half, with the inoculated cheese surfaces facing inward. Folded
183 cheese samples were weighed, then individually vacuum-packaged in standard retail barrier bags
184 (B-2175; Cryovac Food Packaging and Food Solutions, Duncan, SC) and stored at 25°C for up
185 to 15 days. Oxygen transmission rate for the bags was 3-6 cm³/m² at 40°F in 24 h. The initial
186 inoculum level on each cheese slice was ~10⁵ CFU/g.

187 **Sampling and enumeration.** Packaged cheese samples were analyzed following
188 inoculation (time 0) and throughout storage for up to 15 days. Every three days, one cheese slice
189 per pathogen was removed from incubation, the storage/barrier bag was aseptically opened, and
190 Butterfield's phosphate diluent (BPD; Nelson Jameson, Marshfield, WI) was added to create a
191 1:10 (w/w) dilution. The cheese/diluent mixture was stomached in the bag (AES Smasher, AES
192 Chemunex, Bruz, France) for 2 min at high speed. Stomached samples were serially diluted in
193 BPD, and 0.1-ml portions were spread-plated onto LSA, m-LEMB, m-LEMB, and BP for
194 cheeses inoculated with *L. monocytogenes*, *Salmonella* spp., *E. coli* O157:H7, and *S. aureus*,
195 respectively. A preliminary trial confirmed better recovery of *Salmonella* spp. by plating on m-
196 LEMB rather than on Xylose Lysine Desoxycholate agar (XLD; Difco), and better recovery of *E.*

197 *coli* O157:H7 by plating on m-LEMB rather than on Sorbitol MacConkey agar (SMAC; Difco).
198 Inoculated samples were also spread-plated on deMan-Rogosa-Sharpe agar (MRS; Difco) at 0, 6,
199 and 15 days to monitor changes in lactic acid bacteria (LAB) populations during storage, and to
200 thereby investigate the impact, if any, of indigenous, starter, or adjunct bacterial growth on
201 inoculum survival. The m-LEMB spread-plates were incubated 24 h at 35°C, LSA and BP plates
202 48 h at 35°C, and MRS plates 72 h at 35°C, after which time counts were recorded for each plate,
203 with countable plate counts converted to log CFU/g. On m-LEMB, typical colonies of *E. coli*
204 O157:H7 appear colorless to pink, while colonies of *Salmonella* spp. are dark red-black with
205 metallic green sheen. Colonies of *S. aureus* are typically shiny black and surrounded with clear
206 zone on BP agar. *L. monocytogenes* colonies are normally grey in color surrounded by black halo
207 on LSA. Data were used to calculate $\Delta\log$ CFU/g, relative to time 0, over the 15-day storage
208 period for each pathogen/cheese combination.

209 **Literature data search and selection.** To provide additional data to augment our
210 product assessment, data from published literature were combined with data from this study. In
211 searching for relevant published studies, keywords including, but not limited to, “pathogen,
212 survival, cheeses, temperature, pH, salt” were entered into online scientific databases. Reference
213 lists of publications were also screened for relevant studies with appropriate data. Published
214 challenge studies that met the following criteria were selected: (i) the inoculated cheeses were
215 made with pasteurized cow’s milk, (ii) the cheeses were inoculated with at least one of the
216 pathogens: *L. monocytogenes*, *Salmonella*, *E. coli* O157:H7, or *S. aureus*, (iii) the pathogen(s)
217 was inoculated on the finished cheese, and (iv) inoculated cheeses were stored at 20-30°C.
218 Studies with surface-ripened, mold-ripened, Swiss, or processed cheeses, or cheese made with
219 non-bovine milk were excluded. Of 155 studies published between 1959 and 2012 and which

220 investigated pathogen behavior in or on cheeses, six published studies met the criteria (14, 24,
221 25, 33, 34, 39). From each publication, the following information was extracted: type of cheese,
222 temperature and length of storage, type and number of pathogen strains, composition (all
223 available information for pH, a_w , % moisture, %SMP, % TA) of cheeses and behavior (growth
224 vs. no-growth) of pathogen(s) (Table 4).

225 **Evaluating compositional characteristics affecting pathogen growth.** The relationship
226 between compositional factors and behavior of pathogens on cheeses was explored.
227 Compositional factors of cheese: moisture (%), initial pH, %SMP, a_w , and initial TA (%), were
228 paired, i.e. one compositional factor as “x” and one as “y”, and a growth vs. no-growth outcome
229 was plotted for each cheese as a function of the x and y values to analyze the influences of the
230 paired compositional factors on pathogen growth. Values of compositional factors were
231 normalized to a 100-point scale before plotting as follows: for each compositional factor, the
232 minimum value of the data set was subtracted from the observed value and the total was divided
233 by the range of the values and multiplied by 100 to obtain the normalized value, as shown in
234 Equation 2.

$$235 \quad \text{Normalized value} = [(\text{value} - \text{minimum value})/\text{range}] \times 100 \quad (2)$$

236 In this analysis, a “growth” result was indicated for a cheese when the Δ -log CFU/g for
237 any cheese/pathogen combination over the 15-day storage period was a positive value that
238 exceeded the pathogen-specific plating variability: 0.39, 0.41, 0.27, and 0.25 log CFU/g for *L.*
239 *monocytogenes*, *Salmonella* spp. *E. coli* O157:H7 and *S. aureus*, respectively. The growth / no-
240 growth outcome plot from each pair of compositional factors was inspected and compared with
241 predictions from a logistic regression equation (SAS 9.2, SAS Institute, Cary, NC). A model at

242 $P=0.05$ based on the variables pH and %SMP was generated according to the method of
243 McMeekin et al. (29) (Figure 1).

244 **RESULTS AND DISCUSSION**

245 In this study, 67 cheese samples, representing a variety of national brands, were tested for
246 their ability to support pathogen growth during extended storage at 25°C (Table 1, 2). Cheeses
247 were manufactured using pasteurized milk in facilities meeting applicable federal and state food
248 safety regulatory requirements. Cheeses met a standard of identity, where applicable. Among the
249 67 cheese samples tested, 52 were duplicate samples of cheeses from different lots/production
250 dates of the same brand. The majority of cheeses that were tested in this study would be labeled
251 as ‘hard’ or ‘semi-hard’ cheeses according to FDA classification (43), and were expected to be
252 safe for extended room-temperature storage due to reduced moisture level and low pH. Trials on
253 ‘soft’ cheeses with higher moisture were also included in this study in order to clarify
254 compositional differences affecting pathogen growth/no-growth outcomes. Inoculated cheeses
255 were vacuum packaged to prevent mold growth and moisture loss which could inhibit pathogen
256 growth.

257 The FDA, in its guide to microbial challenge testing, notes that it can be important to
258 evaluate a range of intrinsic factors which can influence the safety of a food during its intended
259 shelf life (44). Compositional factors in cheese that could influence pathogen behavior were
260 analyzed: surface pH (Day 0, 3, 6, 9, 12, 15), % moisture, % salt, and a_w (Day 0); and % TA
261 (Day 0, 6, 15). Change in lactic acid bacteria (LAB) count was determined on Day 0, 6, and 15.
262 Across all cheese samples, moisture content ranged from a low of 32.07% to a high of 57.64%,
263 for one lot of Gruyere and Feta cheese, respectively. Salt content ranged from 0.33% for one lot

264 of Lacey Swiss to 3.30% for Queso Blanco. Salt-in-moisture phase (%SMP) was calculated from
265 % moisture and % salt (Equation 1) with values ranging from 0.73% for one lot of Lacey Swiss
266 to 7.21% for one lot of Parmesan. Water activity (a_w) varied little across the cheese samples
267 tested, ranging from 0.96 to 0.99, except for Parmesan (average $a_w=0.93$) (Table 1).

268 Cheese pH measured at the surface, ranged from 4.33 to 6.49 for Feta (average of two
269 lots) and Queso Fresco, respectively (Table 1, 2) on Day 0. Over the 15-day storage period,
270 change in pH ranged from -1.44 to +0.53 pH units, for Queso Fresco and Baby Swiss (average of
271 4 lot), respectively, with most cheeses exhibiting only slight change in pH. To quantify the
272 amount of organic acid present in each cheese at the beginning of storage and to determine the
273 effect, if any, of storage on changes in organic acid level, % TA was measured (Table 1, 2). The
274 %TA across the cheeses tested ranged from 0.26% to 2.83% for Queso Blanco and Feta (average
275 of 2 lots), respectively, at the beginning of storage. Change in %TA over storage was not clearly
276 linked with change in pH and bacterial survival (data not shown). Change in LAB count in
277 cheese samples was estimated during extended storage at 25°C storage (Table 1, 2). LAB count
278 on Day 0 across the cheeses ranged from 2.00 to 8.08 log CFU/g for one lot of Pepper Jack and
279 Monterey Jack, respectively. Initial LAB counts on similar cheese samples from different brands,
280 or different lots of the same brand, could vary widely. The Day 0 count for LAB on different
281 lots of Provolone (reduced-fat) (Brand 3) varied by 3.25 log CFU/g between purchase dates.
282 Similarly, one sample of Provolone (Brand 3) had one of the lowest Day 0 LAB counts, 2.70 log
283 CFU/g, while another sample of a different brand of Provolone (Brand 4) had one of the highest
284 initial LAB counts, 7.70 log CFU/g. The Day 0 LAB counts for the two samples of Brand 3
285 Provolone were 2.70 log CFU/g and 3.78 log CFU/g, and these rose to 5.40 log CFU/g and 7.19
286 log CFU/g, respectively; equivalent to a Δ -log of 2.70 and 3.41 log CFU/g, respectively. The

287 LAB count for the one lot of Brand 4 Provolone increased by one order of magnitude, from 7.70
288 log CFU/g (Day 0) to 8.70 log CFU/g (Day 15). Throughout the storage period and across all
289 cheese samples tested, changes in LAB count ranged from -2.92 CFU/g for one lot of Parmesan
290 to +5.66 log CFU/g for one lot of Pepper Jack (Brand 4). Of the 67 cheese samples tested, LAB
291 population increased on storage in 47 cheese samples tested. LAB count was relatively constant
292 ($0 < \Delta \log \leq 0.3$ log CFU/g) in 7 cheese samples tested, and declined ($\Delta \log \geq -0.3$ log CFU/g) in
293 13 other cheese samples during storage.

294 Cheeses were tested for their ability to support growth of *L. monocytogenes*, *Salmonella*
295 spp., *E. coli* O157:H7, and *S. aureus* (Table 1, 2). Pathogens did not grow on 53 cheese samples
296 over the 15 days (Table 1), while 14 cheese samples supported growth of *S. aureus*, six of
297 *Salmonella*, four of *L. monocytogenes*, and three of *E. coli* O157:H7 (Table 2). The pattern of
298 pathogen survival for each cheese lot was consistent over storage except for Queso Quesadilla
299 (Table 2). We observed growth of *S. aureus* (+0.57 log CFU/g) at Day 6 on Queso Quesadilla
300 however by Day 15 we noted a decrease in pathogen population (overall $\Delta \log = -0.40$ log
301 CFU/g). Of the cheese samples which did support pathogen growth, all supported growth of *S.*
302 *aureus*, ranging from 0.57 to 3.08 log CFU/g (avg. 1.62 log CFU/g across all 14 cheeses).
303 Growth of *L. monocytogenes*, *Salmonella* spp., and *E. coli* O157:H7, ranged from 0.60 to 2.68
304 log CFU/g (avg. 1.60 log CFU/g), 1.01 to 3.02 log CFU/g (avg. 2.05 log CFU/g), and 0.41 to
305 2.90 log CFU/g (avg. 1.69 CFU/g), respectively. Cheese samples which supported growth of *S.*
306 *aureus* included Farmer's, Gruyere (2 lots), Jack (goat's milk), Muenster (Brand 6), Provolone
307 (Brand 3; 2 lots), reduced-sodium Provolone (2 lots), Queso Blanco, Queso Fresco, and 2 brands
308 of String cheese. The six cheeses that supported growth of *Salmonella* spp. included: Gruyere (2
309 lots), Jack (goats' milk), Muenster (Brand 6), Queso Fresco, and one brand of String cheese

310 (Brand 14). The four cheeses that supported growth of *L. monocytogenes* included: Gruyere (one
311 lot), Queso Blanco, Queso Fresco, one brand of String cheese (Brand 14), and the three cheeses
312 that supported growth of *E. coli* O157:H7 included: Muenster (Brand 6), Queso Fresco, and
313 String (Brand 14).

314 Among the cheeses which supported pathogen growth at some point during the 15-day
315 storage period, seven supported only the growth of *S. aureus*: Farmer's, Provolone (Brand 3; 2
316 trials), reduced-sodium Provolone (Brand 6; 2 trials), String cheese (Brand 6) and Queso
317 Quesadilla (at Day 6 sampling point only) (Table 2). Three cheeses supported the growth of *S.*
318 *aureus* and one other pathogen: one lot of Gruyere and Jack (goats' milk) cheese each supported
319 the growth of *S. aureus* and *Salmonella*, while Queso Blanco supported the growth of *S. aureus*
320 and *L. monocytogenes*. Two cheeses supported the growth of three pathogens: one lot of Gruyere
321 supported the growth of *L. monocytogenes*, *Salmonella* spp, and *S. aureus*, and one lot of
322 Muenster (Brand 6) supported the growth of *Salmonella* spp., *E. coli* O157:H7, and *S. aureus*
323 (Table 2). There were two cheeses which supported growth of all four pathogens, Queso Fresco
324 and one brand of String cheese (Brand 14).

325 *Salmonella* spp., *L. monocytogenes* and *E. coli* O157:H7 have, in recent years, been
326 implicated in foodborne illness outbreaks linked to cheeses made with pasteurized milk (7, 11).
327 *S. aureus* has not often been associated with foodborne illness outbreaks linked to cheese, even
328 though this pathogen is generally linked to foods, like cheese, which are often hand-manipulated
329 during processing and packaging (8, 42). We included *S. aureus* in the study design not only
330 because of its link to poor sanitation and post-processing contamination but also because it is the
331 pathogen most likely to grow in or on foods with reduced moisture and/or low a_w (21). For
332 ready-to-eat food products, the FDA has established a zero-tolerance policy for *L.*

333 *monocytogenes*, *Salmonella* spp., and *E. coli* O157:H7, due to the potentially low infectious dose
334 of *E. coli* O157:H7 and *Salmonella* spp, and the high mortality rate (15-30%) associated with *L.*
335 *monocytogenes* infections (41). Although none of these pathogens should be present in finished
336 cheeses made from pasteurized or heat-treated milk, the composition of a cheese supporting
337 growth of any of these bacteria during extended room-temperature storage presents an
338 unacceptable risk. A zero-tolerance policy is not in place for *S. aureus* in ready-to-eat foods
339 because staphylococcal food poisoning occurs as a result of ingestion of a preformed enterotoxin
340 which is only produced in amounts sufficient to cause illness as a result of extended temperature
341 abuse and growth of the pathogen to a high concentration ($\sim 10^5$ CFU) (30). Thus a cheese with
342 compositional characteristics allowing growth of *S. aureus* during storage is also an unacceptable
343 risk. For these reasons, growth of four target pathogens: *L. monocytogenes*, *Salmonella* spp., *E.*
344 *coli* O157:H7, and *S. aureus*, as post-processing contaminants on cheeses was investigated.

345 Pathogen strains used in this study represented a variety of sources and serotypes (Table
346 3). The strains of *L. monocytogenes* and *Salmonella* spp. had been screened in previous research
347 in our laboratory to confirm tolerance to salt and pH conditions typical of cheese (13). Strains of
348 *E. coli* O157:H7, *Salmonella* spp., and *S. aureus* were exposed to acid during inoculum
349 preparation in BHIB, as a pH drop of ~ 1 unit was observed during overnight incubation. *L.*
350 *monocytogenes* was grown in NB, with no acid production or pH drop during inoculum
351 preparation. Where it occurred, the slight exposure to acid during inoculum preparation was
352 unlikely to have led to acid adaptation of strains. Therefore, the key characteristic of strains
353 selected for use in this study was their human or animal/animal-product origin, making these
354 strains perhaps representative of organisms to be found in a food processing or handling
355 environment.

356 Growth of *L. monocytogenes* was observed on four cheese samples: Gruyere, Queso
357 Blanco, Queso Fresco, and one brand of String cheese (Brand 14) (Table 2), ranging from 0.60 to
358 2.68 log CFU/g. Growth of *L. monocytogenes* on Muenster (Brand 6, 0.17 log CFU/g) and
359 String (Brand 6, 0.22 log CFU/g) did not exceed the plating variability for the pathogen (0.39 log
360 CFU/g) and ‘growth’ was not declared. Genigeorgis et al. studied the survival of *L.*
361 *monocytogenes* on 11 different types of market cheeses stored at 30°C (14). Pathogen growth
362 was observed only on Hispanic-style cheeses: Queso Fresco, Queso Ranchero, and Queso
363 Panela, and ranged from 0.38 to 3.18 log CFU/g (14). Uhlich et al. observed an increase of more
364 than 5 log CFU/g of *L. monocytogenes* on Queso Blanco stored at 25°C for up to 6.25 days (39).
365 In the present study, we observed growth of *L. monocytogenes* on one brand of String cheese
366 (Brand 14) that slightly exceeded the plating variability, i.e. the observed growth of 0.60 log
367 CFU/g exceeded the plating variability of 0.39 log CFU/g. Genigeorgis et al. (14) did not
368 observe growth of *L. monocytogenes* on String cheese, instead noting a drop in *L.*
369 *monocytogenes* population of 2.36 log CFU/g over 9 days at 30°C. The String cheese that
370 Genigeorgis et al. tested had similar pH and %SMP values to the cheese sample that we
371 evaluated, but an unknown level of LAB. The String cheese sample in our study allowing some
372 growth of pathogen simultaneously supported a dramatic increase in LAB population, from 4.87
373 log CFU/g at Day 0 to 8.86 log CFU/g by Day 15 (Table 2).

374 Growth of *L. monocytogenes* was not observed on 63 samples of cheese tested (Table 1,
375 2), many of the cheeses which did not support pathogen growth would be classified as ‘hard’ or
376 ‘semi-hard’ cheeses based on FDA classification (43) and may be suitable for extended room
377 temperature storage. Shrestha et al. (33) did not observe growth of *L. monocytogenes* on a range
378 of Cheddar-type cheeses stored at 21°C for 30 days, with counts of *L. monocytogenes* dropping

379 by ≤ 1.1 log CFU/g during storage. We also observed a slight decrease in the population of *L.*
380 *monocytogenes* on mild, reduced-fat, and sharp Cheddar cheeses during storage at 25° (Table 1).
381 Pathogen populations decreased from 0.00 to 0.76 log CFU/g across samples and Cheddar
382 cheese-type tested. Genigeorgis et al. also reported a decrease of *L. monocytogenes* population
383 on mild Cheddar cheeses during storage (14). Similarly, Genigeorgis et al. evaluated the growth
384 of *L. monocytogenes* on Monterey Jack, Colby, Provolone, Muenster, and Feta cheeses during
385 storage, and observed a decrease in pathogen population of $>1-2$ log CFU/g in all cases. In our
386 study, we noted an average decrease in pathogen population of 0.2 log CFU/g for Colby, 4.74 log
387 CFU/g for Feta, 1.83 log CFU/g for Monterey Jack, 0.25 log CFU/g for Muenster (Brand 3), and
388 0.99 log CFU/g for several different types of Provolone (regular, mild, sharp) (Table 1, 2). Two
389 lots of Provolone (Brand 3) which supported growth of *S. aureus* did not support the growth of
390 *L. monocytogenes* (Table 2). One brand of Muenster (Brand 6) appeared to support a slight
391 growth of *L. monocytogenes* during storage (0.17 log CFU/g), but this was found not to exceed
392 the plating variability associated with this pathogen (0.39 log CFU/g), and thus ‘no growth’ was
393 declared.

394 Growth of *Salmonella* was observed on six cheeses: Gruyere, Jack (goat’s milk),
395 Muenster (Brand 6), Queso Fresco, and String (Brand 14), ranging from 1.01 to 3.02 log CFU/g
396 over 15 days. Slight growth of *Salmonella* was also observed for Brand 6 of String cheese (0.39
397 log CFU/g) but this was below the plating variability for this pathogen (0.41 log CFU/g), and
398 therefore counted as ‘no growth.’ Kasrazadeh and Genigeorgis (25) studied the growth of
399 *Salmonella* inoculated onto sliced Queso Fresco stored at 20°C. They noted rapid growth, a lag
400 time of 2.5-3.5 h and a generation time of 1.65-2.17 h, for *Salmonella* on Queso Fresco. We
401 observed an increase in *Salmonella* concentration of 3.02 log CFU/g on Queso Fresco stored at

402 25°C over 15 days. This was the highest level of *Salmonella* growth observed over all 67 cheese
403 samples tested.

404 There were 61 cheeses which did not support the growth of *Salmonella* in this study.
405 Shrestha et al. (34) examined the survival of *Salmonella* on a range of Cheddar-type cheeses
406 stored for up to 30 days at 21°C. Cheddar cheese manufactured to standards of pH and salt was
407 comminuted, inoculated with *Salmonella* spp., and stored at 21°C for up to 30 days. *Salmonella*
408 spp. counts decreased significantly at 21°C for all cheese-types. We evaluated the survival of
409 *Salmonella* spp. on mild, reduced-fat, and sharp Cheddar cheeses and observed average
410 decreases of 0.3, 1.12, and 1.26 log CFU/g, respectively, for the brands tested. Growth of *E. coli*
411 O157:H7 was observed on three cheeses: Muenster (Brand 6), Queso Fresco, and String (Brand
412 14), ranging from 0.41 log CFU/g (Muenster) to 2.90 log CFU/g (Queso Fresco) over 15 days.
413 Kasrazadeh and Genigeorgis (24) also observed rapid growth of *E. coli* O157:H7 on Queso
414 Fresco stored at 20°C. There were 64 cheese samples in this study which did not support the
415 growth of this pathogen.

416 The survival pattern for pathogens on cheeses was consistent during storage, with the
417 exception of the survival of *S. aureus* on Queso Quesadilla which increased by 0.57 log CFU/g
418 on Day 6 of storage, but decreased by 0.40 log CFU/g relative to the time-zero level by Day 15.
419 In all other cases, pathogen growth/no-growth was consistent, displaying an increase or decrease
420 over the 15-day storage period. LAB count increased in 47 of 67 cheeses tested in this study.
421 With one exception, cheeses which supported pathogen growth also supported LAB growth.
422 LAB count decreased in Jack (goat's milk) cheese which supported growth of *Salmonella* (+2.50
423 log CFU/g) and *S. aureus* (+1.62 log CFU/g); otherwise LAB count increased from 1.54 to 4.47
424 log CFU/g in cheeses which supported pathogen growth. The level of inoculum on each cheese

425 slice at time 0 averaged 4.7 log CFU/g (n=268). This level allowed for accurate enumeration of
426 growth or death without reaching the limits of research methodology. This inoculum level could
427 have placed pathogens at a level to effectively compete with active indigenous organisms. LAB
428 count on Day 0 averaged 5.03 log CFU/g for cheeses which supported pathogen growth (n=14,
429 Table 2). While previous studies have shown that initial inoculum level does not affect the
430 survivability or growth kinetics of pathogens (6, 26, 46), a higher proportion of *S. aureus*
431 compared to LAB may aid in the survival of this particular pathogen (17). Although growth of *S.*
432 *aureus* is reported to be weak when a high load of competitive bacteria, e. g. lactic acid bacteria
433 (LAB) is present, increasing the proportion of *S. aureus* to LAB has been shown to aid in
434 survival of this pathogen (17, 23).

435 The change in pH on storage among cheeses that supported pathogen growth showed no
436 clear trend, remaining the same ($\Delta \text{pH} \leq 0.3$ units) in 7 samples, and increasing in 6 samples
437 (Table 2). Cheese samples that supported pathogen growth had %TA which ranged from 0.26 %
438 to 1.67 % at the beginning of storage (Table 2); while cheese samples which did not support
439 pathogen growth had %TA ranging from 0.66% to 2.86% at the beginning of storage (Table 1).
440 Change in %TA over storage (data not shown) had no apparent relationship with the change of
441 pH and LAB count. Among cheeses that supported pathogen growth, LAB count increased in all
442 but one sample (Jack (goats' milk cheese)), with an increase ranging from 1.54 log CFU/g for
443 one lot of reduced sodium Provolone to 4.43 log CFU/g for Farmer's cheese. Correlation
444 between changes in pH and LAB count in cheeses was weak ($r^2=0.25$).

445 A total of 53 cheeses did not support the growth of any pathogen tested. These cheeses
446 were most notably characterized by lower pH; there was little difference in % moisture and
447 %SMP between these cheeses and those that supported pathogen growth. When cheese samples

448 were separated into roughly equal groups by initial pH value: 4.29 - 5.20 (29 cheeses), 5.21 –
449 5.40 (18 cheeses), and 5.41 – 6.50 (20 cheeses), it was readily apparent that pathogen growth
450 was better supported on higher pH cheeses. With the exception of Provolone (Brand 3; pH 5.15)
451 and reduced-sodium Provolone (pH 5.15), cheeses with Day 0 pH ranging from 4.8-5.2 did not
452 support growth of any pathogens (Table 1). Feta was the most acidic cheese tested (average pH
453 4.33, n=2 lots), and pathogen viability on this cheese type decreased over time more than for any
454 other cheese with average reductions of 4.74 log CFU/g for *L. monocytogenes*, 4.82 log CFU/g
455 for *Salmonella* spp., 4.34 log CFU/g for *E. coli* O157:H7, and 3.84 log CFU/g for *S. aureus*. As
456 pH increased to 5.21 - 5.40, four of 18 cheeses supported growth: Provolone (Brand 3; 1 lot),
457 reduced-sodium Provolone (1 lot), String cheese (Brand 6) and Queso Quesadilla; all supporting
458 the growth of *S. aureus* (average 1.14 log CFU/g across all 3 cheeses), but no other pathogen
459 (Table 2). In the pH range 5.41 - 6.50, eight cheeses supported pathogen growth: Jack (goats'
460 milk) (pH 5.41), String (Brand 14, pH 5.44), Farmer's (pH 5.46), Muenster (pH 5.48), Gruyere
461 (2 lots; pH 5.68; 6.28), Queso Blanco (pH 6.37), and Queso Fresco (pH 6.49). Pathogen growth
462 on Queso Fresco was the greatest across all cheeses - tested; this was also the cheese with the
463 highest initial pH. Cheeses with an initial pH \geq 5.46 supported growth of at least one pathogen,
464 with the exception of Swiss-style cheeses (Baby Swiss, Swiss, Lacey Swiss – pH range 5.50 –
465 6.02), and one lot of Havarti (pH 5.49) which did not support growth. Optimal pH for growth of
466 *S. aureus* is between pH 6.0 and 7.0, with pH 4.0 as the reported minimum for growth (20).
467 Minimum pH values for growth that have been reported for *L. monocytogenes*, *Salmonella* spp.,
468 *E. coli* O157:H7 are 4.39, 4.20, and 4.40, respectively (20). Only Feta cheese (pH 4.29, 4.38)
469 was below the reported minimum pH for growth of any of the pathogens tested.

470 The average moisture content for cheese samples which supported growth (43.11%)
471 varied little from moisture content for cheese samples which did not support growth (40.38%)
472 (Table 1 ,2). An even narrower difference in -average SMP was observed between cheeses which
473 supported growth (3.76%) and cheeses which did not support growth (3.52%) (Table 1, 2),
474 however the range of values in each category (growth/no-growth) was much wider, ranging from
475 0.73 to 7.21 %SMP for cheese samples which did not support growth, and from 2.26 to 6.56
476 %SMP for cheese samples that did. The greater growth potential that we observed for *S. aureus*
477 on cheeses could be attributed, in part, to the high salt-tolerance of this pathogen. Nunheimer and
478 Fabian reported that some strains of *S. aureus* are able to tolerate up to 20% NaCl (31).
479 Sutherland et al. (36) reported growth of *S. aureus* in BHIB with pH 4.48 and 8.5% NaCl at
480 25°C. Ingham et al. reported greater tolerance of *S. aureus* than of *L. monocytogenes* to high salt-
481 and low a_w in meat products stored at 21°C (19).

482 Where applicable, we tested cheeses from different brands, or from different lots within
483 the same brand, to allow us to determine lot-to-lot or brand-to-brand variation for a similar type
484 of cheese. For example, Muenster cheese from two manufacturers was tested; cheese from one
485 brand (Brand 6, Table 2) supported growth of three pathogens, *S. aureus*, *Salmonella* spp., and *E.*
486 *coli* O157:H7 (+0.41 to +1.77 log CFU/g;), while Muenster cheese from a different brand (Brand
487 3, Table 1) did not support growth of any pathogen (-0.00 to -0.75 log CFU/g). Among ten
488 Provolone cheeses tested (mild, sharp, regular (3 lots from 2 brands), reduced-fat (2 lots),
489 reduced-sodium (2 lots), and a Provolone-Mozzarella blend), six cheeses (2 lots of reduced-fat,
490 regular, sharp, mild, and Provolone-Mozzarella blend) did not support growth of any pathogen
491 (Table 1). The contribution of pH, %SMP, and other inhibitory compounds present in cheese,
492 such as metabolites of LAB and the presence of free fatty acids may have varied from lot-to-lot,

493 brand-to-brand, and between cheese types, resulting in differences in pathogen growth during
494 non-refrigerated storage. The effect of these factors on microbial survival has been shown to be
495 highly dependent on the concentration of inhibitory compound and the species and strain of both
496 LAB and pathogen (10, 15, 17, 35). The apparent inconsistencies in pathogen growth patterns
497 observed for cheeses of a similar type supports the assertion that it may be compositional
498 characteristics, more than cheese type, that determine the likelihood of pathogen growth on a
499 sample of cheese.

500 The compositional factors of pH, %SMP, a_w , and %TA were paired in all combinations
501 and a pathogen growth / no-growth outcome for each cheese was plotted as a function of each
502 pair of factors. Plotting growth / no-growth outcome as a function of pH and %SMP, combined
503 with logistic regression, created a growth / no-growth interface that could be used to clearly
504 differentiate cheeses which inhibited pathogen growth from those that allowed pathogen growth
505 (Figure 1). A similar approach using other pairs of compositional factors was not successful in
506 generating a clear growth / no-growth interface (data not shown). These results are consistent
507 with those of Oh et al. who evaluated the effect of compositional factors of low-sodium Cheddar
508 cheeses on the growth of strains of *Salmonella* spp., *L. monocytogenes*, *S. aureus*, and Shiga
509 toxin-producing *E. coli* (STEC). In a model low-sodium Cheddar-cheese extract, STEC survived
510 significantly better than the other three pathogens. Principal component analysis indicated that
511 STEC survival was primarily determined by pH, and not by % salt or % lactate (32).

512 The eight Swiss-style cheese samples tested did not fit the pattern established by data
513 from the other cheeses tested. These Swiss-style cheeses had the lowest %SMP (0.73-1.87%) of
514 all cheeses tested, a relatively high pH (5.36-6.02), and a high a_w (0.98-0.99). Despite
515 compositional factors which seem to be permissive for growth, none of the Swiss-style cheeses

516 supported pathogen growth. Leyer and Johnson reported poorer survival of *Salmonella* spp. on
517 Swiss cheeses than on Cheddar and Mozzarella (27). Swiss-style cheeses are unique among the
518 types of cheeses that we tested due to the addition of propionic acid bacteria added as an adjunct
519 culture in cheese manufacture. The added propionic acid bacteria can produce metabolites with
520 antimicrobial properties, such as propionic acid, acetic acid, and diacetyl (9). Studies have shown
521 greater antimicrobial properties linked to propionic acid ($pK_a=4.87$) as compared to lactic acid
522 ($pK_a=3.86$) (37). The results of our study would suggest that target pathogens will not grow on
523 Swiss-style cheeses during extended storage at 25°C, but the safety of such cheeses should be
524 evaluated independently from cheeses which are fermented using only lactic acid-producing
525 bacteria. Similarly, research suggests that the ability of pathogens to grow on bacterial surface-
526 ripened or mold-ripened should be evaluated independently from cheeses manufactured without
527 these ripening adjuncts. Bacterial surface-ripened and mold-ripened cheeses have added cultures
528 that are capable of growing and altering the environment for pathogen growth. Growth of added
529 bacterial and/or mold cultures can result in the production of antimicrobial compounds (e.g.
530 bacteriocins) which could hinder pathogen growth, but can also lead to lactate metabolism which
531 can subsequently increase cheese pH and enhance pathogen growth (5). Genigeorgis et al. found
532 a significant reduction of *L. monocytogenes* (> -2.36 log CFU/g) when inoculated onto
533 Limburger, a bacterial surface-ripened cheese (14). While the high pH of Limburger (pH 7.2)
534 would suggest that this cheese could support pathogen growth, the growth of smear bacteria
535 results in extensive lipolysis which produces a high concentration of free fatty acids, which are
536 compounds known to have antimicrobial activity (35). Goats' milk cheese may also contain high
537 levels of free fatty acids. Woo et al. evaluated the free fatty acid content in a variety of cheeses
538 and concluded that Blue, Swiss, Limburger, and goats' milk cheeses contained high

539 concentrations of free fatty acids (47). Thus, we conclude that surface-ripened cheeses, mold-
540 ripened cheeses, and non-cow's milk cheeses, along with Swiss-style cheeses should be
541 evaluated separately, perhaps by group, and more data gathered in order to assess their suitability
542 for extended non-refrigerated storage.

543 Water activity (a_w) and pH are the two criteria used in the FDA Food Code to determine
544 the shelf stability of food products (45). However, %SMP can be seen as a more appropriate
545 factor than a_w in assessing the likelihood of pathogen survival on cheese. In addition to salt, other
546 solutes in cheese such as non-protein nitrogen-containing compounds and products released
547 during proteolysis, could contribute to the reduction of a_w , yet these compounds may not play a
548 role in inhibiting pathogen growth (28). Tapia et al. (38) suggested that the usefulness of
549 measured a_w as an indicator of microbial safety or stability is diminished by the 'specific solute
550 effect'; that is that the solute in the food matrix dramatically alters the minimum a_w for microbial
551 growth. Hilderbrand (18) supported %SMP as a more reliable factor than a_w in determining
552 bacterial growth in smoked fish. In addition, %SMP is routinely determined and has historically
553 been used in the cheese industry as a measure of product quality. Our search of published
554 literature indicated that other researchers investigating survival of pathogens as post-processing
555 contaminants on cheese routinely monitored %SMP (14, 24, 25, 33, 34, 39), while only a few
556 studies investigating pathogen survival on cheese considered the impact of product a_w (33, 34,
557 39). Furthermore we identified that pH and %SMP were the two compositional factors which
558 could be used to clearly differentiate cheeses which supported pathogen growth from those that
559 inhibited growth (Figure 1), while the compositional factors of pH and a_w were not similarly
560 effective.

561 Of the 67 market cheeses studied, 53 did not support the growth of *L. monocytogenes*,
562 *Salmonella*, *E. coli* O157:H7, or *S. aureus* and could safely be kept at $\leq 25^{\circ}\text{C}$ for an extended
563 period of time. The risk of pathogen growth for those cheeses which supported growth can be
564 characterized as follows: *S. aureus* (growth on 14 of 14 cheeses supporting pathogen growth) >>
565 *Salmonella* (growth on 6 of 14) > *L. monocytogenes* (growth on 4 of 14) > *E. coli* O157:H7
566 (growth on 3 of 14). Of several intrinsic compositional factors associated with cheese, i.e. pH, a_w ,
567 %SMP, and %TA, cheese pH has the clearest effect on pathogen growth. Laboratory data was
568 combined with relevant published research in order to expand our product assessment. Pathogen
569 growth/no-growth outcomes for 82 cheeses, 56 cheeses tested in our laboratory and 26 cheeses
570 for which published results were available in the literature, were plotted on a graph with axes of
571 pH and %SMP. Logistic regression analysis generated a $P=0.05$ boundary line, which indicated a
572 clear differentiation between cheese compositions (in terms of pH and %SMP) which supported
573 pathogen growth and those which did not. Data from Swiss-type cheeses, mold-or bacterial-
574 ripened cheeses, or cheeses made with non-bovine milk were excluded from this analysis due to
575 insufficient data or lack-of-fit. The growth/no-growth interface established by the logistic
576 regression line clearly shows that many common cheese types, if made from pasteurized cows'
577 milk in compliance with US regulatory standards, can safely be considered non-TCS foods. Non-
578 TCS cheeses should be described in terms of pH and %SMP rather than cheese-type or brand,
579 and would include cheeses with pH/%SMP values more restrictive than any of the following
580 combinations drawn from Figure 1 (in order of increasing pH): $\leq 4.60/\geq 0.24$; 4.61-4.70/0.25-
581 0.91; 4.71-4.80/0.92-1.58; 4.81-4.90/1.59-2.24; 4.91-5.00/2.25-2.91; 5.01-5.10/2.92-3.58; 5.11-
582 5.20/3.59-4.25; 5.21-5.30/4.26-4.92; 5.31-5.40/4.93-5.59; 5.41-5.50/5.60-6.26; and 5.51-
583 5.60/6.27-6.93. More research would be necessary to develop boundary conditions for safe,

584 extended room-temperature storage of cheeses not covered in this model, including Swiss-type
585 cheeses, bacterial surface-ripened or mold-ripened cheeses, cheeses made from non-bovine milk,
586 or cheeses made from unpasteurized milk.

587

588 **ACKNOWLEDGEMENTS**

589 This research was funded by a grant from the Wisconsin Milk Marketing Board with
590 support from the National Institute of Food and Agriculture, United States Department of
591 Agriculture, under WIS01584. The authors acknowledge support of Ms. Engstrom from the Land
592 O'Lakes Scholarship Fund 2010-2011. The authors wish to thank those companies in Wisconsin
593 which donated cheese to this project.

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745 **Table 1.** Composition of natural cheeses that did not support growth of *L. monocytogenes*, *Salmonella* spp., *E. coli* O157:H7, and *S.*
 746 *aureus* and pathogen survival (Δ log CFU/g) during storage for 15-days at 25°C.

Cheese ^a	Brand	% Moisture ^b	% Salt ^c	%SMP ^d	a _w ^e	pH ^f		%TA ^g	LAB count ^h		Pathogen survival (Δ log CFU/g) ⁱ			
						0 d	15 d		0 d	15 d	LM	SALM	EC	SA
Asiago (Young)	1	36.00	1.71	4.53	0.96	5.36	5.21	2.16	7.36	6.87	-2.05	-3.74	-2.12	-1.13
Asiago (Young)	1	38.63	1.83	4.52	0.96	5.12	5.01	2.82	7.79	7.40	-2.26	-2.12	-0.68	-1.07
Asiago (Aged)	10	38.84	0.96	2.41	0.97	5.15	4.98	1.78	6.22	7.16	-2.92	-2.79	-3.70	-3.53
Asiago (Aged)	10	43.30	1.94	4.29	0.97	5.09	5.06	2.02	6.02	6.94	-3.84	-3.63	-1.59	-2.67
Baby Swiss	5	38.36	0.61	1.57	0.98	5.77	6.28	^j	7.07	7.50	-0.71	-1.38	-1.98	-0.62
Baby Swiss	5	36.25	0.69	1.87	0.98	5.79	6.32	-	6.94	8.05	-0.67	-0.76	-0.75	-1.15
Baby Swiss	9	37.21	0.62	1.64	0.99	5.55	6.04	-	7.19	7.72	-1.00	-2.43	-1.27	-0.79
Baby Swiss	9	35.58	0.65	1.79	0.99	5.71	6.27	-	7.35	7.72	-0.39	-1.45	-0.61	-1.02
Brick	11	40.39	1.52	3.63	0.96	5.43	4.90	1.29	7.23	7.66	-0.40	-0.71	-0.38	-0.74
Brick	11	41.21	1.95	4.52	0.97	5.30	4.98	0.90	7.19	7.82	-0.32	-0.70	-0.40	-0.98
Brick	2	38.28	1.52	3.82	-	5.25	5.37	1.07	6.33	8.08	-0.09	-0.22	-0.42	-0.79
Cheddar (Mild)	3	37.34	1.57	4.04	0.96	5.09	5.00	1.89	7.41	6.78	-0.70	-0.88	-0.30	-0.43
Cheddar (Mild)	3	36.59	1.77	4.61	0.97	5.09	5.06	1.44	7.39	6.81	-0.76	-1.00	-0.80	-0.17
Cheddar (Reduced-Fat)	6	40.26	1.60	3.82	0.97	5.19	5.11	1.15	5.35	6.21	-0.13	-0.65	-0.43	-1.28
Cheddar (Reduced-Fat)	6	44.00	1.66	3.64	0.98	4.99	5.27	0.90	5.52	5.79	-0.69	-0.57	-0.55	-0.97
Cheddar (Sharp)	3	36.34	1.78	4.67	0.96	5.27	5.27	1.69	4.30	6.39	-0.35	-0.75	-0.96	-1.19
Cheddar (Sharp)	3	36.57	1.32	3.48	0.97	5.19	5.28	1.71	4.63	5.84	0.00	-1.03	-0.59	-1.34
Cheddar-Mozzarella	6	40.09	1.62	3.88	-	5.19	5.33	1.42	6.99	6.24	-0.09	-0.27	-0.31	-0.48
Colby	4	35.96	1.61	4.28	0.96	5.45	5.61	1.09	5.76	7.39	-0.39	-0.50	-0.21	-0.57
Colby	4	40.14	1.60	3.83	0.97	5.30	5.47	1.78	5.91	6.38	-0.11	-0.63	-0.24	-0.39
Colby Jack	5	36.13	1.42	3.78	0.96	5.17	5.10	1.26	7.19	7.19	-0.20	-0.97	-0.80	-0.46
Colby Jack	5	36.85	1.35	3.53	0.98	5.01	5.40	1.37	7.70	7.38	-0.44	-0.59	-0.08	-0.46
Colby Jack (Reduced-Fat)	6	43.96	1.64	3.60	0.97	5.29	5.00	1.09	5.79	7.68	0.02	-0.90	-0.76	-1.12
Colby Jack (Reduced-Fat)	6	46.00	1.76	3.69	0.97	5.08	5.11	1.39	4.52	6.91	-0.56	-0.74	-0.73	-1.05
Colby Jack (Reduced-Na)	6	36.30	1.26	3.35	0.97	5.11	5.03	1.48	4.52	6.91	-0.17	-0.46	-1.03	-1.09
Colby Jack (Reduced-Na)	6	36.45	1.13	3.01	0.98	5.09	5.17	0.89	4.12	5.40	-0.69	-0.96	-0.39	-0.64
Feta	3	57.10	2.35	3.95	0.99	4.29	4.60	2.80	4.80	6.57	-4.58	-4.71	-4.60	-2.93
Feta	3	57.64	1.72	2.90	0.98	4.38	4.53	2.86	3.30	3.40	-4.89	-4.94	-4.07	-4.74
Gouda	6	41.15	1.62	3.79	0.97	5.28	5.25	0.88	7.29	7.38	-0.51	-0.32	-0.23	-0.83

Non-TCS Cheeses, Supporting Document #1, 45 pages total

Gouda	6	41.08	1.39	3.27	0.97	5.30	5.28	1.24	7.40	7.48	-0.44	-0.46	-0.34	-0.79
Havarti	3	37.79	1.33	3.40	0.97	5.49	5.52	1.08	6.88	7.26	-0.25	-0.61	-0.21	-0.73
Havarti	3	38.17	1.20	3.05	0.98	5.34	5.59	0.66	6.88	7.20	-0.51	+0.21 ^k	-0.29	+0.01 ^k
Havarti	6	41.32	1.27	2.98	-	5.11	5.26	1.40	8.28	7.75	-0.16	-0.61	-0.37	-0.70
Monterey Jack	5	45.10	1.87	3.98	0.98	5.15	5.20	2.41	8.08	8.16	-1.03	-0.91	-0.33	-0.37
Monterey Jack	5	35.45	1.64	4.42	0.97	5.08	5.11	2.28	8.06	7.98	-2.63	-1.17	-0.91	-0.66
Muenster	3	42.20	1.63	3.72	0.97	5.20	5.28	1.27	6.90	7.80	-0.49	-0.25	-0.24	0.00
Muenster	3	41.94	1.75	4.01	0.98	5.29	5.12	0.74	7.11	6.26	-0.10	-0.75	-0.45	-0.46
Parmesan	8	32.44	2.52	7.21	0.93	5.41	5.36	1.40	6.92	4.00	-0.88	-1.45	-1.25	-0.59
Parmesan	8	32.70	2.35	6.70	0.92	5.45	5.40	1.48	5.31	7.23	-1.51	-1.66	-1.86	-1.80
Pepper Jack	4	36.13	1.58	4.19	0.98	5.11	4.76	2.12	2.00	7.66	-0.85	-3.87	-0.81	-1.09
Pepper Jack	4	38.69	1.60	3.97	0.97	4.93	5.12	1.94	4.69	7.14	-2.86	-3.40	-3.25	-3.58
Pepper Jack	3	40.42	1.64	3.90	0.97	5.14	5.12	1.53	4.65	7.30	-2.39	-2.32	-2.10	-0.72
Pepper Jack	3	38.27	1.54	3.87	0.97	5.21	5.15	1.45	8.25	7.39	-0.62	-0.73	-0.35	-0.30
Provolone	4	42.15	1.38	3.17	-	5.24	4.97	1.81	7.70	8.70	-1.34	-0.97	-0.16	-0.72
Provolone (Mild)	8	43.05	2.08	4.61	-	5.18	5.22	1.80	5.53	6.70	-0.50	-1.84	-0.57	-0.71
Provolone (Sharp)	10	40.02	1.72	4.12	-	5.09	5.17	2.20	6.43	7.45	-1.59	-2.83	-1.27	-1.73
Provolone (Reduced-Fat)	3	48.98	1.43	2.84	0.97	4.97	4.67	1.83	6.95	7.98	-2.80	-2.23	-0.62	-1.55
Provolone (Reduced-Fat)	3	52.71	1.35	2.50	0.98	4.98	4.94	-	3.70	7.94	-0.56	-0.95	-0.24	-0.97
Provolone-Mozzarella	6	42.26	1.68	3.82	-	5.38	5.33	1.61	7.67	7.28	-0.25	-0.19	-0.17	-0.68
Swiss	6	38.57	0.52	1.33	0.98	5.36	5.50	-	5.95	6.59	-1.20	-1.11	-0.73	-2.32
Swiss	6	36.91	0.64	1.70	0.99	5.50	5.80	-	5.28	6.19	-0.93	-1.30	-0.36	-1.20
Swiss (Lacey)	5	45.17	0.33	0.73	0.99	6.02	5.87	-	7.00	8.18	-0.43	-1.19	-0.46	-1.02
Swiss (Lacey)	5	45.92	0.37	0.80	0.99	5.65	5.94	-	7.92	5.70	-1.83	-1.21	-0.31	-1.06

747

748 ^a Cheeses were national brands obtained from local retail outlets or directly from manufacturers. Qualifying descriptive information, e.g. ‘mild,’

749 ‘sharp’ is reproduced where provided on the package.

750 ^b Moisture content (%) of cheese sample on Day 0, n=2.

751 ^c % salt of cheese sample on Day 0, n=2.

752 ^d % salt-in-moisture phase (%SMP) of cheese sample on Day 0. Calculated from % moisture and % salt of the same cheese.

- 753 ^e Water activity (a_w) of cheese sample on Day 0.
- 754 ^f pH of cheese slice surface on Day 0 and Day 15, n=2.
- 755 ^g % titratable acidity (%TA) of cheese sample on Day 0 and Day 15, n=2.
- 756 ^h DeMan-Rogosa-Sharpe (MRS) agar count for lactic acid bacteria (LAB) on Day 0 and Day 15 (log CFU/g), n=2.
- 757 ⁱ Survival of pathogen LM=*L. monocytogenes*, SALM=*Salmonella* spp., EC=*E. coli* O157:H7, and SA=*S. aureus*. (+) indicates
- 758 growth, (-) indicates no-growth.
- 759 ^j not determined.
- 760 ^k Growth of pathogen did not exceed plating variability: 0.39, 0.41, 0.27, 0.25 log CFU/g for *L. monocytogenes*, *Salmonella* spp., *E.*
- 761 *coli* O157:H7 and *S. aureus*, respectively.

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Table 2. Composition of natural cheeses that supported growth of *L. monocytogenes*, *Salmonella* spp., *E. coli* O157:H7, and/or *S. aureus* and pathogen survival (Δ log CFU/g) during storage for 15-days at 25°C.

Cheese ^a	Brand	% Moisture ^b	% Salt ^c	% SMP ^d	a _w ^e	pH ^f		% TA ^g		LAB count ^h		Pathogen survival (Δ log CFU/g) ⁱ			
						0 d	15 d	0 d	0 d	15 d	LM	SALM	EC	SA	
Farmer's	12	39.85	1.71	4.11	- ^j	5.46	4.99	1.14	4.63	9.10	-0.41	-0.10	-0.39	+1.48 ^l	
Gruyere	7	34.25	1.01	2.86	0.97	5.68	5.74	1.04	5.70	7.40	+1.01	+1.01	-0.40	+3.08	
Gruyere	7	32.07	1.41	4.21	0.98	6.28	5.78	1.55	5.04	6.70	-0.54	+2.13	-0.67	+2.19	
Jack (goats' milk)	13	45.20	2.33	4.90	-	5.41	5.24	1.44	7.74	6.88	-0.40	+2.50	-0.62	+1.62	
Muenster	6	41.58	1.21	2.83	-	5.48	5.53	0.66	4.85	7.67	+0.17 ^k	+1.65	+0.41	+1.77	
Provolone	3	43.17	1.03	2.33	0.97	5.29	4.78	1.36	2.70	5.40	-1.10	-0.40	-0.88	+0.80	
Provolone	3	44.08	1.58	3.46	0.98	5.15	5.19	1.55	3.78	7.19	-0.40	-0.80	-0.52	+0.81	
Provolone (Reduced-Na)	6	42.93	1.05	2.39	0.98	5.15	4.95	1.24	6.25	7.79	-1.20	-0.31	-0.30	+0.62	
Provolone (Reduced-Na)	6	44.09	1.02	2.26	0.98	5.28	5.12	1.62	5.73	7.39	-0.29	-0.27	-0.63	+1.59	
Queso Blanco	7	47.02	3.30	6.56	0.96	6.37	6.11	0.26	4.38	6.78	+2.68	-1.07	-2.11	+2.57	
Queso Fresco	7	51.19	1.85	3.49	0.98	6.49	5.05	0.31	4.86	8.68	+2.09	+3.02	+2.90	+1.55	
String	14	47.91	1.98	3.97	-	5.44	4.96	1.59	4.87	8.86	+0.60	+2.00	+1.75	+2.39	
String	6	47.07	2.18	4.43	-	5.33	5.02	1.67	4.85	8.65	+0.22 ^k	+0.39 ^k	-0.38	+1.58	
Queso Quesadilla	7	43.10	2.18	4.81	0.97	5.35	5.39	1.21	4.57	6.29	-0.01	-0.57	-0.48	-0.40 ^m	

763

764 ^a Cheeses were national brands obtained from local retail outlets or directly from manufacturers. Qualifying descriptive information,

765 e.g. 'mild,' 'sharp' is reproduced where provided on the package.

766 ^b Moisture content (%) of cheese sample on Day 0, n=2.

767 ^c % salt of cheese sample on Day 0, n=2.

768 ^d % salt-in-moisture phase (%SMP) of cheese sample on Day 0. Calculated from % moisture and % salt of the same cheese.

769 ^e Water activity (a_w) of cheese sample on Day 0.

- 770 ^f pH of cheese slice surface on Day 0 and Day 15, n=2.
- 771 ^g % titratable acidity (%TA) of cheese sample on Day 0 and Day 15, n=2.
- 772 ^h DeMan-Rogosa-Sharpe (MRS) agar count for lactic acid bacteria (LAB) on Day 0 and Day 15 (log CFU/g), n=2.
- 773 ⁱ Survival of pathogen LM=*L. monocytogenes*, SALM=*Salmonella* spp., EC=*E. coli* O157:H7, and SA=*S. aureus*. (+) indicates
774 growth, (-) indicates no-growth.
- 775 ^j not determined.
- 776 ^k Growth of pathogen did not exceed plating variability: 0.39, 0.41, 0.27, 0.25 log CFU/g for *L. monocytogenes*, *Salmonella* spp., *E.*
777 *coli* O157:H7 and *S. aureus*, respectively
- 778 ^l Bolded numbers indicate growth beyond the pathogen-plating variability.
- 779 ^m Growth (+ 0.57 log CFU/g) at Day 6 sampling; no net growth over 15-day storage period

780 Table 3. Pathogen strains used in laboratory cheese challenge studies.

Inoculum	Serotype	Strain ^a	Collection ^b	Source ^c
<i>Listeria monocytogenes</i>	4b	LM 101	FRI	Hard salami
	4b	LM 310	FRI	Goat cheese
	4b	ATCC 43256	ATCC	Mexican-style cheese, Calif. (1985 outbreak strain)
	4b	ATCC 43257	ATCC	Mexican-style cheese, Calif. (1985 outbreak strain)
	4b	ATCC 51414	ATCC	Raw milk, Massachusetts
	4b	ATCC 51776	ATCC	Cheese, Belgium
	4b	ATCC 51777	ATCC	Cheese, Belgium
	4b	ATCC 51778	ATCC	Cheese, Belgium
	4b	Scott A	FRI	Clinical
	1/2a	V7	FRI	Raw milk
<i>Salmonella</i> spp.	Cerro	FSL R8-370	FSL	Bovine
	Typhimurium	FSL S5-433	FSL	Bovine
	Newport	FSL S5-436	FSL	Bovine
	Agona	FSL S5-517	FSL	Human
	Typhimurium	FSL S5-536	FSL	Human
	Newport	FSL S5-639	FSL	Human
<i>Escherichia coli</i> O157:H7	O157:H7	FR1K 22	FRI	Unknown
	O157:H7	FR1K 2000	FRI	Bovine
	O157:H7	F5854	FRI	Cheese curds (1998 outbreak strain)
	O157:H7	039732	NMDH	Gouda cheese (2010 outbreak strain)
	O157:H7	CWD EC1	VT	Farmstead goat cheese
<i>Staphylococcus aureus</i>		I	FPL	Raw milk
		J	FPL	Raw milk
		FRI 100	FRI	Cake
		FRI 1007	FRI	Genoa sausage
		ATCC 25923	ATCC	Clinical

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782 ^aStrain designation provided by Collection.783 ^bCollection: FRI = Food Research Institute, University of Wisconsin-Madison, Madison, Wisc.;

784 ATCC = American Type Culture Collection, Manassas, Va.; FSL = Food Safety Laboratory, Dr.

785 Katherine Boor, Cornell University, Ithaca, N.Y.; NMDH = New Mexico Department of Health,

786 Santa Fe, N.M.; VT = Vermont Institute for Artisan Cheese, Dr. D.J. D'Amico, University of

787 Vermont, Burlington, Vt.; FPL= Food Pathogen Laboratory, Dr. Barbara Ingham, University of

788 Wisconsin-Madison, Madison, Wisc.

789 ^c Source provided by Collection.

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807 Table 4. Data from published research selected to augment laboratory product assessment.

Reference	Pathogen	No. of strains	Cheese	Storage (days)	Temp (°C)	pH ^a	%SMP ^b	a _w	Growth/Death ^c
31	<i>Salmonella</i>	9	Queso Fresco	- ^d	20	6.60	1.64	-	LT ^e :2.5 - 3.5h GT: 1.65 - 2.17 h
30	<i>E. coli</i> O157:H7	2	Queso Fresco	-	20	6.60	1.61	-	LT: 3 - 3.45 h GT: 2.33 - 2.56 h
42	<i>L. monocytogenes</i>	5	Cheddar	30	21	5.06	1.70	0.98	-1.11
						5.30	1.80	0.97	-0.48
						5.66	5.00	0.95	-0.14
						5.28	4.80	0.95	-0.96
43	<i>Salmonella</i> spp.	5	Cheddar	30	21	5.06	1.70	0.98	-3.2
						5.30	1.80	0.97	-3.9
						5.66	5.00	0.95	-3.8
						5.28	4.80	0.95	-3.5
48	<i>L. monocytogenes</i>	5	Queso Blanco	6.25	25	6.80	4.53	0.97	> 5.00
17	<i>L. monocytogenes</i>	5	Queso Fresco	3	30	6.60	6.60	-	+0.39
			Queso Fresco	6	30	6.60	4.50	-	+0.95
			Queso Fresco	3	30	6.50	6.15	-	+0.74
			Queso Ranchero	1	30	6.20	4.10	-	+2.60
			Queso Panela	3	30	6.20	2.50	-	+1.81
			Queso Panela	1	30	6.70	3.95	-	+3.18
			Queso Panela	3	30	6.60	3.48	-	+0.79
			Cotija	8	30	5.60	9.60	-	> -2.00
			Cotija	6	30	5.50	12.50	-	> -2.00
			Monterey Jack	4	30	5.00	3.00	-	> -1.40
			Monterey Jack	13	30	5.20	2.72	-	> -2.09
			Mild Cheddar	4	30	4.90	2.60	-	> -1.26
			Mild Cheddar	7	30	5.20	4.49	-	> -2.09
			Colby	9	30	5.50	4.93	-	> -2.36
			String Cheese	9	30	5.50	4.24	-	> -2.36
			Provolone	9	30	5.60	4.62	-	> -2.36
			Muenster	9	30	5.50	3.80	-	> -2.36
Domestic Feta	4	30	4.30	7.50	-	> -2.04			
Domestic Feta	4	30	4.30	2.20	-	> -2.04			

808 ^a pH values of cheeses at initial sampling point of experiment

809 ^b Certain publications stated %SMP as % brine, which was calculated using the same equation as
810 in this study (Equation 1). For publications that included both %moisture and % salt, % SMP
811 was calculated using Equation 1.

812 ^c Behavior of pathogen over storage, expressed as $\Delta\log$ CFU/g or LT/GT.

813 ^d Not specified.

814 ^e LT: Lag time (h); GT: generation time (h).

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831 **Figure legend.**

832 Figure 1. Growth (Δ) or No-Growth (x) of *Listeria monocytogenes*, *Salmonella* spp.,
833 *Escherichia coli* O157:H7, and *Staphylococcus aureus* on cheeses stored at 20-30°C based on
834 cheese pH (Day 0) and %SMP (salt-in-moisture-phase). Data from published research (n=26;
835 Table 4) and this study (n=55). Solid line represents the growth/no-growth interface ($P=0.05$).

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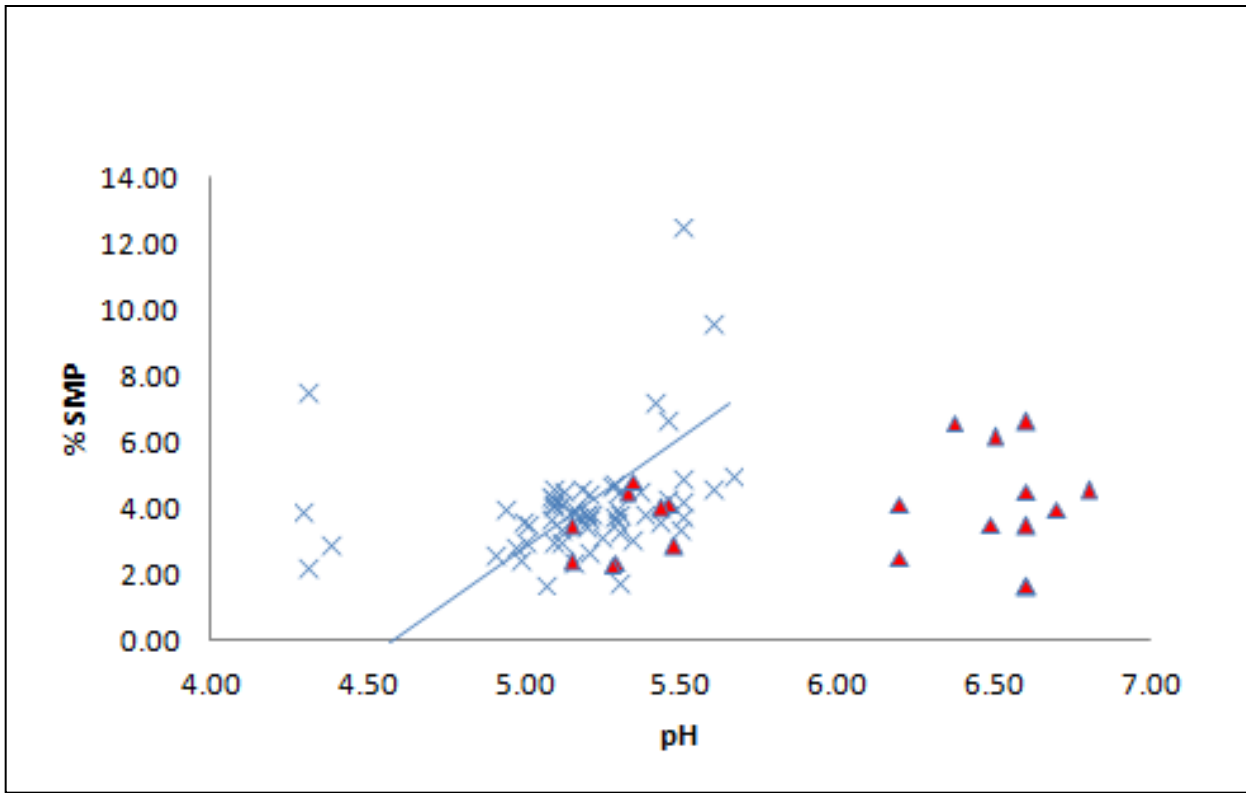
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