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Additional Information

1 **Formulation and application of the probability of exceedance metric for risk**
2 **characterization of non-threshold chemical hazards in food**

3 **Abstract**

4 The aim of this work is to present the rationale, formulation, and application of the
5 probability of exceedance (POE) as a metric capable of characterizing public health risks
6 due to exposure to non-threshold chemical hazards in food. One of the main advantages of
7 this metric is that it complements the information provided by the MOE and supports risk
8 managers in decision-making, especially when the distribution of the estimated intake is
9 positively biased. For a better understanding of its benefits, MOE and POE values were
10 calculated in relation to the exposure to inorganic arsenic (iAs) and lead (Pb) in the diet of
11 the Australian, Chinese, European, Japanese and American adult populations. The findings
12 showed that similar MOE values, and therefore similar levels of concern, can have
13 differences in POE results of up to several orders of magnitude, suggesting that more
14 effective risk management measures should be prioritised.

15

16 **Keywords**

17 Chemical hazards, Arsenic, Lead, Diet, Margin of exposure, Risk characterization, Risk-
18 informed decision-making.

19

20 1. Introduction

21

22 Metals, natural constituents of the environment, have increased their concentrations
23 above their natural levels due to natural and human activities and now even contaminate our
24 food (Kachenko & Singh, 2006; Perez, et al., 2018). Metals consumed in food accumulate
25 in the body and may reach toxic levels, creating problems such as cardiovascular, kidney
26 and bone diseases, which can lead to serious damage to health over time (Ferrante, et al.,
27 2019; Signorelli, et al., 2019; Fiore et al., 2020). The control of consumers' exposure to
28 metals in food has thus long been and continues to be a matter of food safety concern.

29 Risk assessment is now being used as a tool to support decision-making processes in food
30 safety management policies to protect consumers' health. It consists of the following four
31 steps: hazard identification, hazard characterization, exposure assessment and risk
32 characterization (WHO/IPCS 2009; Domenech & Martorell, 2016).

33 When a carcinogenic chemical substance has been identified in food, hazard
34 characterization generally considers that carcinogenic processes can be grouped into two
35 major modes of action (MOA): the first is when the compound or its active metabolite reacts
36 covalently with DNA (genotoxic), and the second when the action is epigenetic and
37 produces tumours by a mechanism other than genotoxicity (non-genotoxic) (Gray & Collins,
38 2000; Loeb & Loeb, 2000). In the first case, there is a risk of cancer to humans at any level
39 of exposure and therefore there is no safe exposure dose, i.e. there is no threshold dose.
40 However, there is a threshold dose for non-genotoxic carcinogens, below which adverse
41 effects are unlikely to occur (Dybing et al., 2002). This difference often determines not only
42 the selection of the risk assessment methodology, but also risk characterization.

43 Inorganic arsenic (iAs) and lead (Pb) are both classified by the International Agency for
44 Research on Cancer as probably carcinogenic to humans, Group 1 and Group 2A,

45 respectively (IARC, 2020). Following the first toxicological studies, the Joint FAO/WHO
46 Expert Committee on Food Additives (JECFA) established a provisional tolerable weekly
47 intake (PTWI) as a threshold dose for each one. However, subsequent studies showed that
48 uncertainty in the dose-response relationships and the observed adverse effects indicated
49 that it was not appropriate to establish such a threshold dose (U.S. EPA, 2004; EFSA, 2009;
50 EFSA, 2010).

51 For non-threshold carcinogens such as iAs and Pb the Joint FAO/WHO Expert
52 Committee on Food Additives (JECFA), the International Life Sciences Institute's European
53 Branch (ILSI Europe) and EFSA (European Food Safety Authority) proposed the use of the
54 margin of exposure (MOE) as an indicator of the level of public health concern (Barlow et
55 al., 2006). The MOE is defined as the ratio between a reference point (RP) and the exposure
56 dose to the carcinogen substance for a given population (US EPA 2012; EFSA, 2016; EFSA
57 2017).

58 The MOE can thus be used as a risk characterization metric and can help in making
59 decisions on strategic risk management objectives, especially if it is accompanied by an
60 appropriate narrative explaining the uncertainties inherent in the data (EFSA, 2005; Barlow
61 et al., 2006; WHO/IPCS, 2009). The EFSA/WHO (2006) emphasized that the basis for
62 decision-making should not be the MOE alone as it is only one component of the overall risk
63 assessment and recommended a dialogue between risk assessors and risk managers to better
64 interpret the implications of specific MOE magnitudes for human health.

65 In this context the aim of the present work was to introduce the fundamentals and
66 formulation of the probability of exceedance (POE) metric, which provides complementary
67 information to the MOE in risk characterization to support risk managers' decision-making.
68 This metric is better suited to assessing public health risks than the MOE, particularly those
69 of dietary toxic substances, which often have positively skewed intake distributions. A case

70 study was included in which MOE and POE were calculated for iAs and Pb intake through
71 the total diet in adults from five different countries.

72

73 2. Theory and calculation

74

75 This section compares the rationale and formulation of the POE and MOE metrics within
76 the risk characterization framework.

77

78 2.1. Margin of exposure

79 The MOE is commonly calculated as the ratio between a RP, $BMDL(i,e,p)$, and the estimated
80 human exposure, $EDI(i)$, which must include the uncertainty that may arise from the
81 uncertainty in both $EDI(i)$ and $BMDL(i,e,p)$. A Pure Monte Carlo method may be used to
82 propagate the variability from the inputs $EDI(i)$ and $BMDL(i,e,p)$ to the output to yield a *pdf*
83 for $MOE(i,e,p)$ by adopting Eq. (1).

84

$$85 \quad MOE(i, e, p) = \frac{BMDL(i,e,p)}{EDI(i)} \quad (1)$$

86

87 Where, $EDI(i)$ units are $\mu\text{g}/\text{kg}\text{-bw}/\text{day}$ (μg per kg of bodyweight per day), which represents
88 the overall exposure to hazard i across the entire diet (FAO/WHO, 2008). The BMDL (lower
89 confidence limit of the BMD) is normally used rather than the BMD (benchmark dose) as a
90 RP for risk characterization (EFSA, 2005, WHO/IPCS, 2009; US EPA 2012; EFSA, 2016;
91 EFSA 2017). The BMD was introduced as an approximation to the dose-response
92 relationship. It represents the exposure dose to the chemical (i) that produces a
93 predetermined change in the response (p) of the adverse health effect (e). This predetermined

94 change in the response is called the benchmark response (BMR) (Haber et al., 2018). Then,
95 first, an increased response BMR must be defined, e.g. $p=1\%$, which means that the
96 incidence (response level) has increased 1% in relation to the background response. The
97 BMDL ensures that the chosen BMR is not exceeded at a 95% confidence level (EFSA,
98 2016; Haber et al., 2018). The identified BMDL often ranges within an interval instead of
99 being a single value because of the uncertainty involved in determining the BMDL process.

100 Fig. 1 represents the *pdf* of the EDI(*i*) distribution by a purple line, $f(E)$, and E_m is the
101 mean value of the EDI(*i*) distribution. The vertical green lines represent the reference point
102 under the BMDL approach. Thus, if the BMDL is given by a single value, e.g.
103 $BMDL(i,e,p)=D$ (solid green line), it represents the exposure dose at which there is a
104 percentage increase in response not exceeding p , e.g. 1% at a 95% confidence level, in
105 relation to an adverse health effect e , e.g. lung cancer, produced by ingesting a hazard i , e.g.
106 iAs. Alternatively, the BMDL can be given in an interval range $[D_1, D_2]$ (dotted green lines).
107 For example, mean MOE could be calculated as the ratio D/E_m in Fig. 1.

108 In interpreting the results of the MOE (i,e,p), EFSA in (2005) proposed that for a
109 genotoxic and carcinogenic compound, a value of 10,000 or more based on a $BMDL_{10}$ from
110 an animal study would be of low concern from a public health point of view and could be
111 considered as a low priority for risk management measures.

112 However, several proposals have been made for iAs, which does not appear to have direct
113 genotoxicity but is rather a secondary effect. The Committee on Carcinogenicity of
114 Chemicals in Food, Consumer Products and the Environment agreed that a MOE of 10 or
115 greater associated with 0.5% increased risk ($BMDL_{0.5}$) for lung cancer in humans could be
116 considered of low concern in this case (COT, 2016). The Swedish National Food Agency
117 (SNFA) developed a tool for comparing chemical risks associated with chronic exposure via
118 food consumption (SNFA, 2015). It provided a risk classification approach that categorizes

119 health concern levels. For iAs it proposed a relationship between risk class, level of health
120 concern and the MOE associated with $BMDL_{0.5}$ for human lung cancer, which has been
121 adapted in Table 1 to compare the MOE and the POE results in the case study.

122 For Pb, the EFSA Panel on Contaminants in the Food Chain considered cardiovascular
123 and nephrotoxicity effects, with the associated 1% and 10%, increased BMR, respectively
124 (EFSA, 2010). It concluded that MOE of 10 or greater is of negligible public health concern.
125 However, at lower MOEs greater than one, the concern was considered to be very low for
126 cardiovascular effects and nephrotoxicity, indicating that the risk of both effects cannot be
127 discarded for MOEs lower than one.

128128

129 *2.2. Probability of exceedance*

130 The probability of exceedance in the context of this manuscript is adapted from the
131 general definition of a probabilistic margin in (Doménech & Martorell; 2016). Thus, Eq. (2)
132 formulates the probability of exceedance, $POE(i,e,p)$, which implicitly includes uncertainty
133 assessment arising from the uncertainty in both $EDI(i)$ and $BMDL(i,e,p)$. As with the MOE,
134 a standard Monte Carlo method can be used to propagate the variability from the input
135 distributions to obtain the variability in the POE.

136136

$$137137 \quad POE(i, e, p) = \Pr(EDI(i) > BMDL(i, e, p)) = \int_{BMDL(i,e,p)}^{\infty} f(E) dE \quad (2)$$

138138

139 The $POE(i,e,p)$ represents the probability that exposure dose to a carcinogenic hazard,
140 $EDI(i)$, exceeds the $BMDL(i,e,p)$. The result obtained after the quantification of $POE(i,e,p)$
141 always ranges between zero and one. The red area in Fig. 1 represents the $POE(i,e,p)$ result

142 for the particular case of an RP given by a single value, i.e. D , which represents the area of
143 the $EDI(i)$ distribution that exceeds D .

144 The POE is thus a measure of the probability that the change in the response of the
145 population exceeds the predefined BMR. It could be interpreted also as the fraction of total
146 population exposed to increased risk. For example, using Table 1, for iAs it would provide
147 an estimate of the fraction of the population exposed to risk class #1.

148 The $POE(i,e,p)$ metric can thus be used as a measure of the level of concern, i.e. the higher
149 the POE the greater the level. A POE value equal to zero would mean that $EDI(i)$ never
150 exceeds the suggested $BMDL(i,e,p)$ and one can conclude that there is no concern with
151 regard the background response of the population. A value of this metric close to zero would
152 mean that $EDI(i)$ almost never exceeds the suggested $BMDL(i,e,p)$ and thus that the level
153 of concern though not high cannot be disregarded. A value close to one would mean that
154 exposure exceeds the RP with a high probability indicating a high level of concern.

155155

156 **3. Materials and methods**

157

158 This section describes a case study and the data and method adopted calculate MOE and
159 POE using the equations given above using data from five countries for total adult dietary
160 intake of iAs and Pb.

161

162 *3.1. Exposure data*

163

164 Total diet studies (TDS) of Australian, Chinese, European, Japanese, and American adult
165 populations were considered to assess exposure to iAs and Pb. These diets were chosen to

166 include a variety of countries around the world with different exposure distribution function
167 parameters, e.g. mean value, kurtosis coefficient, etc., to facilitate the subsequent discussion
168 of the results.

169 Table 2 shows the mean and the 95th percentile of the exposure to iAs and Pb in total diet
170 for each country, with the sole exception of Australia and the United States, for which the
171 original sources give the Pb exposure value at the 90th percentile. The last column shows the
172 exposure daily intake distribution functions used to carry out the case study. These EDI
173 distributions are the result of adjusting the available data from the original source to a gamma
174 distribution with @Risk 7.6 software (Palisade, Middlesex, UK) following Vilone et al
175 (2014), who concluded that a gamma distribution is preferable to a normal distribution to fit
176 food consumption.

177177

178 *3.2. Inorganic arsenic reference point*

179179

180 In 2010, the Joint FAO/WHO Expert Committee on Food Additives (JECFA) considered
181 epidemiological studies to suggest a lower benchmark dose confidence limit for a 0.5%
182 higher incidence of lung cancer (BMDL_{0.5}) of 3.0 µg/kg-bw per day. However, a sensitivity
183 analysis to investigate the impact of uncertainty in the exposure estimate of the reference
184 study population to iAs in drinking water and food indicated that this BMDL_{0.5} could be in
185 the range of 2.0-7.0 µg/kg-bw per day (FAO/WHO, 2011; WHO, 2011a).

186 On the other hand, the EFSA panel on contaminants in the food chain suggested a
187 BMDL₀₁ between 0.3 and 8 µg/kg-bw per day for a 1% higher incidence risk of cancer of
188 the lung, skin, and bladder, as well as skin lesions (EFSA, 2009; ECHA, 2013). This expert
189 group chose a 1% excess risk as these doses are likely to be within the range of exposures
190 experienced by average and high-level European consumers.

191 Table 3 shows the RPs used in the application case for iAs, damage (LC= lung cancer;
192 LSBC= skin, bladder, and lung cancer) and increased incidence (BMDL_{0.5} and BMDL₀₁,
193 respectively). Both were assumed to follow a uniform distribution, as this is the non-
194 informative distribution that assumes that all outcomes are equally likely.

195195

196 *3.3. Lead reference point*

197197

198 In the absence of a health-based guidance value (HBGV), the EFSA (2010) proposed a
199 BMDL₀₁ of 1.50 µg/kg-bw/day as RP for cardiovascular damage to systolic blood pressure
200 in adults, and a BMDL₁₀ of 0.63 µg/kg-bw/day for nephrological damage causing chronic
201 kidney disease in adults. All these values are listed in Table 4 and represent the RPs for Pb
202 considered in the case study.

203203

204 *3.4. Method*

205205

206 A standard Monte Carlo method was performed to propagate the variability from the input
207 distributions to obtain the variability in the MOE and POE distributions using Eqs (1) and
208 (2) respectively. A total of 100,000 iterations per simulation were run using Latin Hypercube
209 sampling. The simulation procedure was composed of the above data and equations as a
210 spreadsheet model in Microsoft Excel, with add on @Risk 7.6 software (Palisade,
211 Middlesex, UK).

212

213 **4. Results and Discussion**

214

215 *4.1. Inorganic arsenic*

216

217 The results of the MOE and POE metrics comparison with the BMDL₀₁ and BMDL_{0.5},
218 defined for dietary exposure to iAs and for each of the countries studied, are given in Table
219 5.

220 The highest mean MOE values were found in Australia, where mean MOE, in relation to
221 BMDL (iAs, LSBC, 01) and BMDL (iAs, LC, 0.5), were 275.65 and 313.15, respectively.
222 The mean EDI is therefore far from both RPs, which means that the level of concern was
223 low in relation to both BMDLs for average adult consumers, according to the MOE
224 interpretation criterion introduced in Section 2.1. The remaining countries had mean MOE
225 values ranging from 21.09 to 46.65, one order of magnitude lower than those for Australia,
226 which means that regardless of the chosen BMDL, the level of concern could be classified
227 as low to moderate following the same criterion (Table 1).

228 Fig. 2 shows that the shape of the EDI distributions varied widely by country. The
229 interpretation of the mean MOE leads to conclusions about the level of concern for dietary
230 exposure to iAs of the average adult population. Conclusions need to be drawn about the
231 level of concern in adult groups with high dietary exposure. The 5th percentile MOE provides
232 information on this group of adults from the 95th percentile EDI with a dietary exposure to
233 iAs.

234 The highest 5th percentile MOE values were again found in Australia. Compared with
235 BMDL (iAs, LSBC, 01) its 5th percentile MOE was 10.89 and 24.50 (iAs, LC, 0.5), showing
236 that the dietary exposure to iAs of this group of Australian adults was not so far from the
237 RPs, which means the level of concern is in the low-to-moderate range in relation to both
238 BMDLs for this group of adults according to the MOE criterion (Table 1). The MOE result
239 at the 5th percentile for the USA in relation to the BMDL (iAs, LSBC, 01) and BMDL (iAs,
240 LC, 0.5) indicates a moderate-to-high and low-to-moderate level of concern, respectively.

241 The remaining countries obtained values ranging from 1.96 to 8.39, which implies a
242 moderate-to high level of concern.

243 These MOE results were similar to those obtained by other authors in previous studies.
244 The Centre for Food Safety conducted the First Hong Kong TDS and in relation to the
245 BMDL (iAs, LC, 0.5) found that the MOEs ranged from 9 to 32 for the average Hong Kong
246 population and from 5 to 18 for high consumers (CFS, 2012). The CFS concluded that the
247 higher the MOE the lower the health concern and that efforts should be made to reduce the
248 populations' exposure to iAs. In France, Chan-Hon-Tong et al., (2013) studied dietary
249 pregnant women's iAs exposure and obtained a mean MOE of 1.2 in relation to
250 $BMDL_{01}=0.3\mu\text{g}/\text{kg}\text{-bw}/\text{day}$ and 33 in relation to $BMDL_{01}=8$, highlighting that these MOE
251 values were too low to exclude risks as the exposures appeared to be of concern. In Italy,
252 Cubadda et al., (2016) studied daily exposure to iAs, finding that the MOE relative to
253 $BMDL_{01}$ for average adult exposure ranged from 4 to 114 and the MOE for adult exposure
254 at the 95th percentile ranged from 1 to 32. They also pointed out that efforts to reduce iAs
255 dietary intakes were needed in general and not only for adults.

256 The 5th percentile MOE values ranging from 1 to 10 for some countries suggested that the
257 highest EDI values in these countries may be very close to the RPs. This indicates the
258 existence of a group of adults with very high dietary exposure to iAs, which could exceed
259 the RPs and depends on the shape of the country's EDI distribution (see Fig. 2). The level
260 of concern for this group would therefore be high, as the corresponding MOE would be less
261 than one (Table 1). The use of the POE metric, which quantifies the probability of the EDI
262 exceeding the BMDL, helps to draw conclusions about the role of this group of adult
263 population with very high dietary exposure to iAs and the level of concern regarding the
264 background response of the adult population.

265 The probability of the EDI exceeding the BMDL (iAs, LC, 0.5) was zero for all the
266 countries, apart from Japan, where this probability was very low (Table 1). According to the
267 POE interpretation criterion introduced in Section 2.2, in relation to the BMDL (iAs, LC,
268 0.5), in general, there was no concern regarding the background response of the adult
269 population. The level of concern was very low for Japan, as only a 0.001 % of the adult
270 population would be exposed to an increased risk in relation to the BMDL (iAs, LC, 0.5).

271 In contrast, the POE for the BMDL (iAs, LSBC, 01) was not zero for any country. It was
272 very low for Australia and the USA, while it was low for China and the EU and not so low
273 for Japan. The POE results provided extra information that complemented the 5th percentile
274 of the MOE results. Thus, last three countries reached a similar 5th percentile of MOE (from
275 1.96 for Japan to 3.02 for China) in relation to BMDL (iAs, LSBC, 01), however, the
276 corresponding mean Japanese POE was one order of magnitude higher than the Chinese and
277 EU POEs, while the MOE (5th percentile) in the USA was 4.96, which was very close to the
278 Chinese (3.02) and the EU (2.90), although the mean USA POE value was two orders of
279 magnitude lower than the corresponding Chinese and EU values. These POE results can be
280 seen in Fig 2, where only the EDI distribution for Australia and the USA were almost always
281 below the BMDL (iAs, LSBC, 01).

282 Based on the POE interpretation criterion given in Section 2.2 and the results for
283 BMDL₀₁, only 0.00036% of Australian and 0.004% of USA adults would be exposed to an
284 increased risk in relation to the BMDL (iAs, LSBC, 01), so that the level of concern would
285 be very low for both countries. In contrast, 0.145%, 0.171% and 1.42% of the adult
286 population in China, the EU, and Japan, respectively, would be exposed to the increased risk
287 in relation to the BMDL (iAs, LSBC, 01), so the level of concern would not be high but
288 neither would it be low. Thus, the MOE at the 5th percentile in relation to the BMDL (iAs,
289 LSBC, 01) for the EU (2.90) and Japan (1.96) were similar and the level of concern can be

290 classified as moderate to high for both (Table 1). However, the POE results show a difference
291 of one order of magnitude in relation to the adult population exceeding the response
292 background in each country, 0.17% and 1.42%, respectively. The level of concern could
293 therefore be interpreted as closer to moderate in the case of the EU and closer to high in the
294 case of Japan.

295

296 *4.2. Lead*

297

298 Table 6 shows the MOE and POE results for the two types of health effects considered in
299 the present study in relation to estimated daily Pb intake in total diet.

300 The results of the mean MOE for cardiovascular effect indicated that, according to the
301 MOE criterion in section 2.1., dietary exposure to Pb of EU adults (4.94) can be considered
302 of very low concern, while for the remaining countries (ranging from 13.95 to 61.18) it can
303 be considered of no public health concern. In addition, the 5th percentile of the MOE values
304 obtained suggested that the level of concern in adult groups with high dietary exposure to
305 Pb was of no concern for the USA (21.03), while it was of very low concern for this group
306 of high consumers in the remaining countries (ranging from 1.27 to 9.67).

307 Similar results were found by the EFSA (2010), who, taking into account data of Pb
308 concentrations in various food commodities and tap water from 2003 to 2009, assessed the
309 Pb dietary exposure for average and high adults consumers across European countries and
310 calculated the margin of exposure compared with the BMDL₀₁ (1.5 µg/kg-bw/day). The
311 average consumer MOE was 1.2-4.2 and 0.62 - 2.1 for high consumers, indicating that the
312 second population group's Pb could be a potential concern. On the other hand, the RIVM
313 assessed the intake of Pb via food in the Netherlands, concluding that the MOEs for
314 cardiovascular effects in adults were higher than one for median and 95th percentile of

315 exposure (3.7 and 2.1, respectively), considering that the risk of a cardiovascular effects was
316 very low (NIPHE, 2017). Juric et al., (2018) carried out a risk assessment of dietary Pb
317 exposure in Ontario (Canada) using a total diet study for the total population and found that
318 mean MOE was 6.2 and 0.81 at 95th percentile, concluding that high consumers were
319 exposed to a high risk of Pb toxicity. Higher values were found by Malavolti et al. in (2020)
320 in assessing the dietary intake of Pb in the North of Italy and determined that the mean MOE
321 was 7.7 and 4.4 for the 95th percentile, concluding that the effect on the systolic blood
322 pressure due to Pb intake was of low concern.

323 According to the extra information provided by the POE metric (see also Fig. 3), the POE
324 for Australia and the USA was zero and consequently, by the POE interpretation criterion
325 given in Section 2.2, there would be no concern regarding the background response of the
326 adult population to cardiovascular effects in these countries. On the other hand, the POE for
327 EU and Japan, although not zero, was very low (over 1E-07), which means that the risk of
328 this effect cannot be discarded for the small fraction of the adult population with a large
329 dietary exposure to Pb. However, China presented the worse scenario, as about 1.84% of its
330 adult population would be exposed to an increased risk of cardiovascular health effects due
331 to dietary Pb intake. This suggested mean and 5th percentile of the MOE do not give the
332 complete picture to draw conclusions about the possibility of having a greater response
333 above the background and the level of concern. Thus, for example, the 5th percentile MOE
334 for EU and China are quite similar, 1.81 and 1.27 respectively, but nevertheless China's POE
335 is five orders of magnitude higher than that of the EU.

336 The results of the mean MOE for nephrotoxicity effect showed two groups. In the first
337 the USA and Australia had MOE values higher than 10 (25.69 and 13.99, respectively),
338 which would mean that dietary exposure to Pb in these countries can be considered of
339 negligible public health concern in relation to nephrotoxicity effects, according to the MOE

340 criterion given in Section 2.1. In the second group Japan, China and EU had values ranging
341 from one to ten (7.9, 5.86 and 2.07, respectively), which would mean that dietary exposure
342 could be considered of very low concern. In addition, the 5th percentile of the MOE values
343 obtained suggested that the level of concern in adult groups with high dietary exposure to
344 Pb was very low for the USA, Australia and Japan (8.83, 4.06 and 1.97, respectively) in
345 relation to nephrotoxicity. On the other hand, the 5th percentile of the MOE values, which
346 were lower than one for the EU and China (0.76 and 0.53, respectively) suggested that the
347 risk of the nephrotoxicity effect cannot be discarded for these countries.

348 These results are quite similar to those published by other authors. The EFSA (2010)
349 found that the average consumer's MOE was 0.51-1.8, considering that for the first value
350 the possibility of an effect of Pb cannot be excluded. However, for values higher than one,
351 the risk of nephrotoxicity could be considered low. In relation to high consumers the MOE
352 ranges from 0.26 to 0.86, concluding that the possibility of a Pb effect should be considered
353 of concern. In the same vein, NIPHE in (2017) reported that at the median exposure level
354 the MOE in adults was 1.5, concluding that the risk of a nephrotoxicity effect was considered
355 to be very low. However, for high consumers it was 0.9, concluding that the health risks to
356 the kidney of long-term exposure to Pb cannot be excluded.

357 On the other hand, the POE obtained for Australia and the USA was zero and
358 consequently, there would be no concern for the background response of the adult population
359 to nephrotoxicity in these countries, which confirms the conclusions obtained when the mean
360 MOE was considered. Moreover, the POE for China and the EU revealed that about 25% of
361 their adult population would be exposed to an increased risk in relation to nephrotoxicity
362 due to dietary Pb intake. This again confirms the conclusions obtained when the 5th percentile
363 of the MOE was considered. However, again, the mean and 5th percentile of the MOE did
364 not show the full picture. For example, the 5th percentile MOE for Japan was 1.97, which

365 suggested a very low level of concern according to this criterion, but nevertheless Japan's
366 POE result suggested that about 0.2% of its adult population would be exposed to an
367 increased risk regarding the background response for nephrotoxicity.

368368

369 **5. Concluding remarks**

370370

371 The POE metric complements the information provided by the MOE metric permitting
372 an improved risk characterization. One of the main advantages of the POE metric is that it
373 considers the whole EDI distribution when considering the percentage of the population that
374 exceeds the RP and therefore has a risk above the pre-established risk for the background
375 population response. The POE metric is thus especially appropriate for characterising public
376 health risks when the distribution of the estimated daily intake of a non-threshold chemical
377 hazard is positively skewed and thus helps to draw risk-informed conclusions about the level
378 of concern regarding the BMDL.

379 The case study carried out on iAs and Pb numerical data showed how similar MOE values
380 and consequently similar levels of concern, had different probabilities (i.e. POE) of having
381 an increased background risk of suffering an adverse health effect. In short, the POE made
382 it possible to nuance the level of concern and to provide information on the risk of dietary
383 exposure to iAs and Pb, so that risk managers can act accordingly to reduce the level of
384 concern and the increased risk of adverse health effects using both MOE and POE
385 information.

386

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Fig. 1. Key concepts in formulating the POE metric defined for a chemical hazard (i), an effect (e) a predetermined change in the response BMR (p), where $f(E)$ is the probability density function of the daily intake distribution $EDI(i)$; E_m is the mean EDI value, BMDL(benchmark dose lower confidence limit) at 5th, 50th and 95th percentile, (D_1 , D and D_2 , respectively) and POE is the probability of exceedance (red area under the $f(E)$ curve) that exceeds the reference point (in this case the mean BMDL, D)

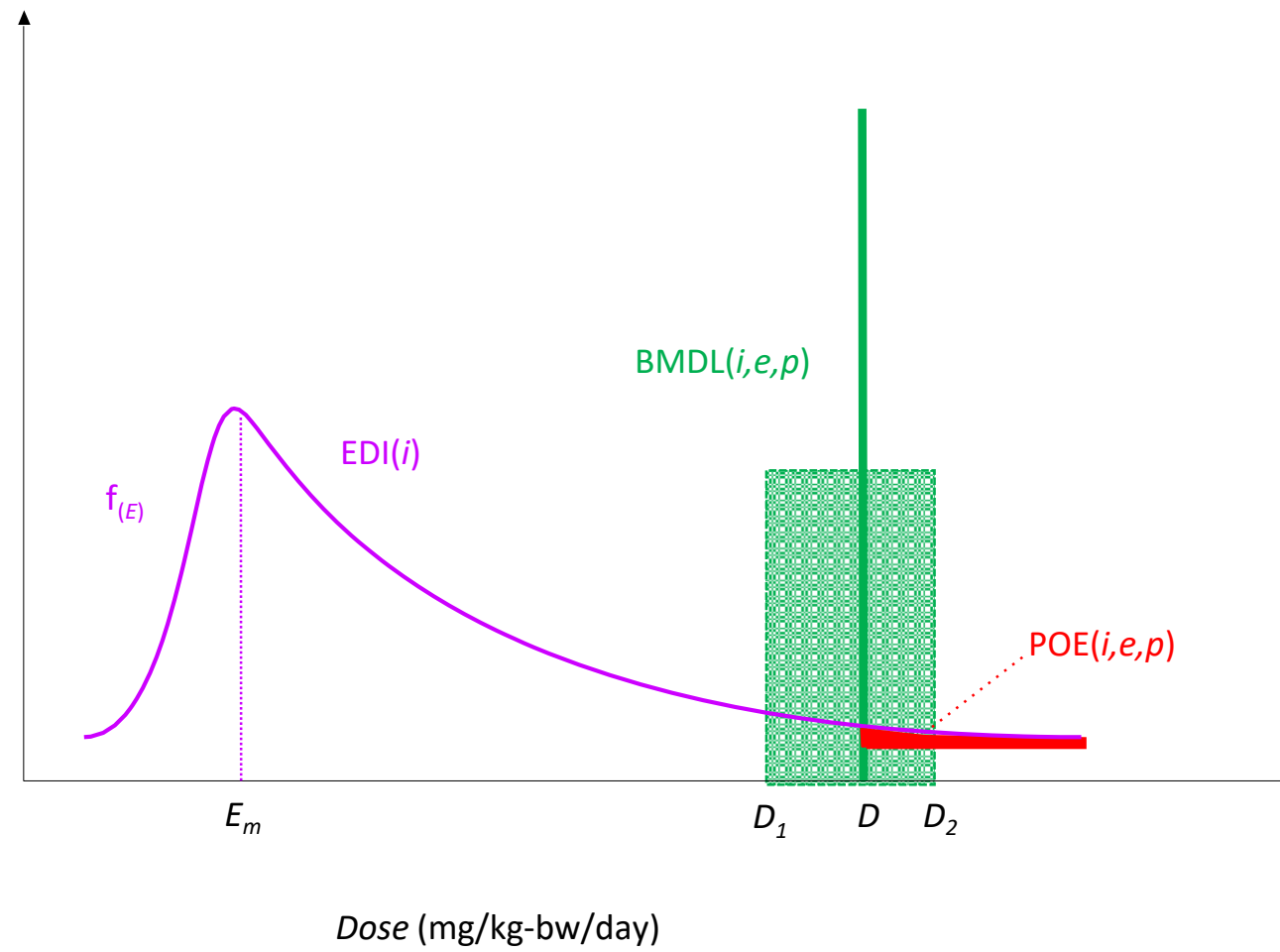


Fig. 2. Key concepts in formulating the POE metric defined for a chemical hazard (i), an effect (e) a predetermined change in the response BMR (p), where $f(E)$ is the probability density function of the daily intake distribution $EDI(i)$; E_m is the mean EDI value, BMDL (benchmark dose lower confidence limit) at 5th, 50th and 95th percentile, (D_1 , D and D_2 , respectively) and POE is the probability of exceedance (red area under the $f(E)$ curve) that exceeds the reference point (in this case the mean BMDL, D).

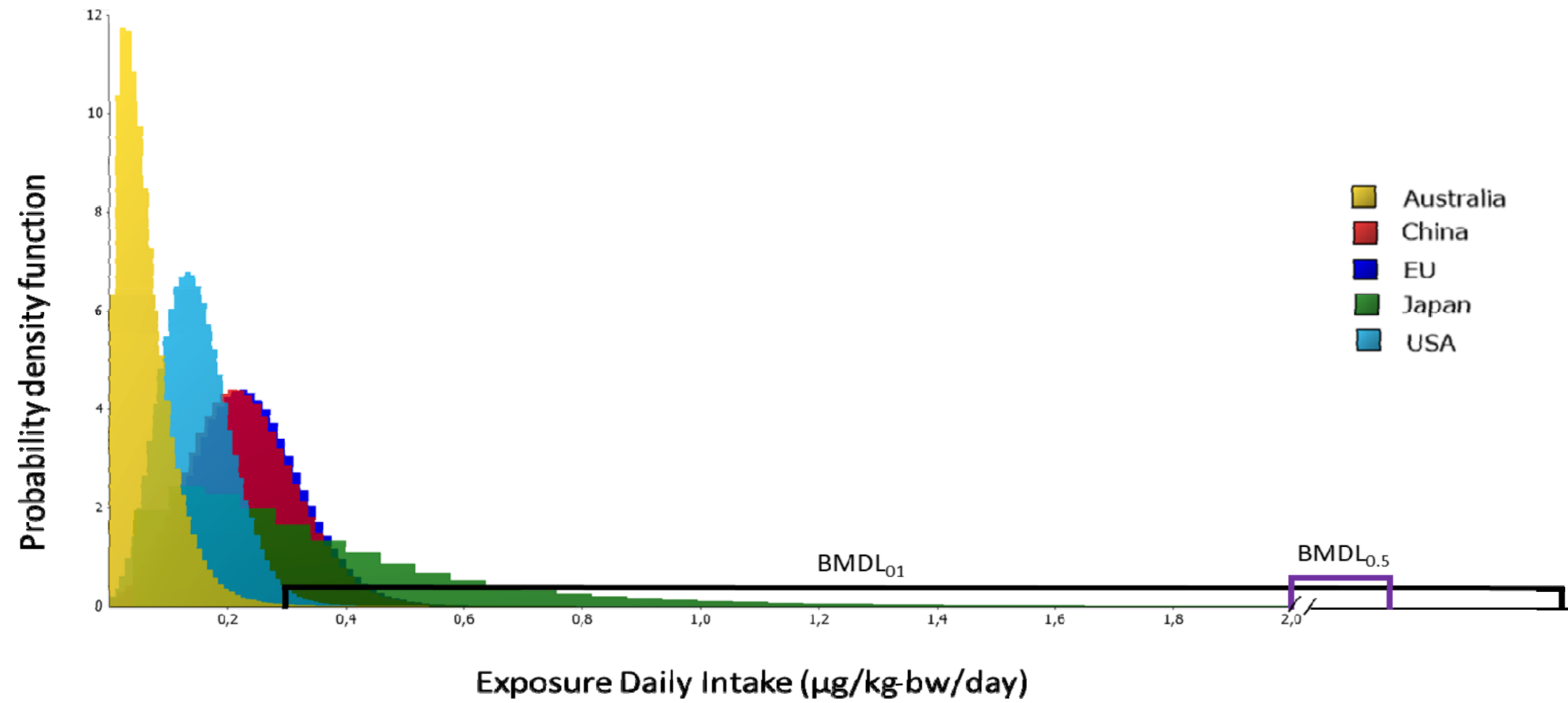


Fig. 3. EDI probability density function for iAs in different countries and two BMDLs as reference points: BMDL0.5 for 0.5% increase in response to having lung cancer ($2-7\mu\text{g}/\text{kg}\text{-bw}$ per day), and BMDL01 for 1% increase in response to having lung, bladder or skin cancer ($0.3-8\mu\text{g}/\text{kg}\text{-bw}$ per day)

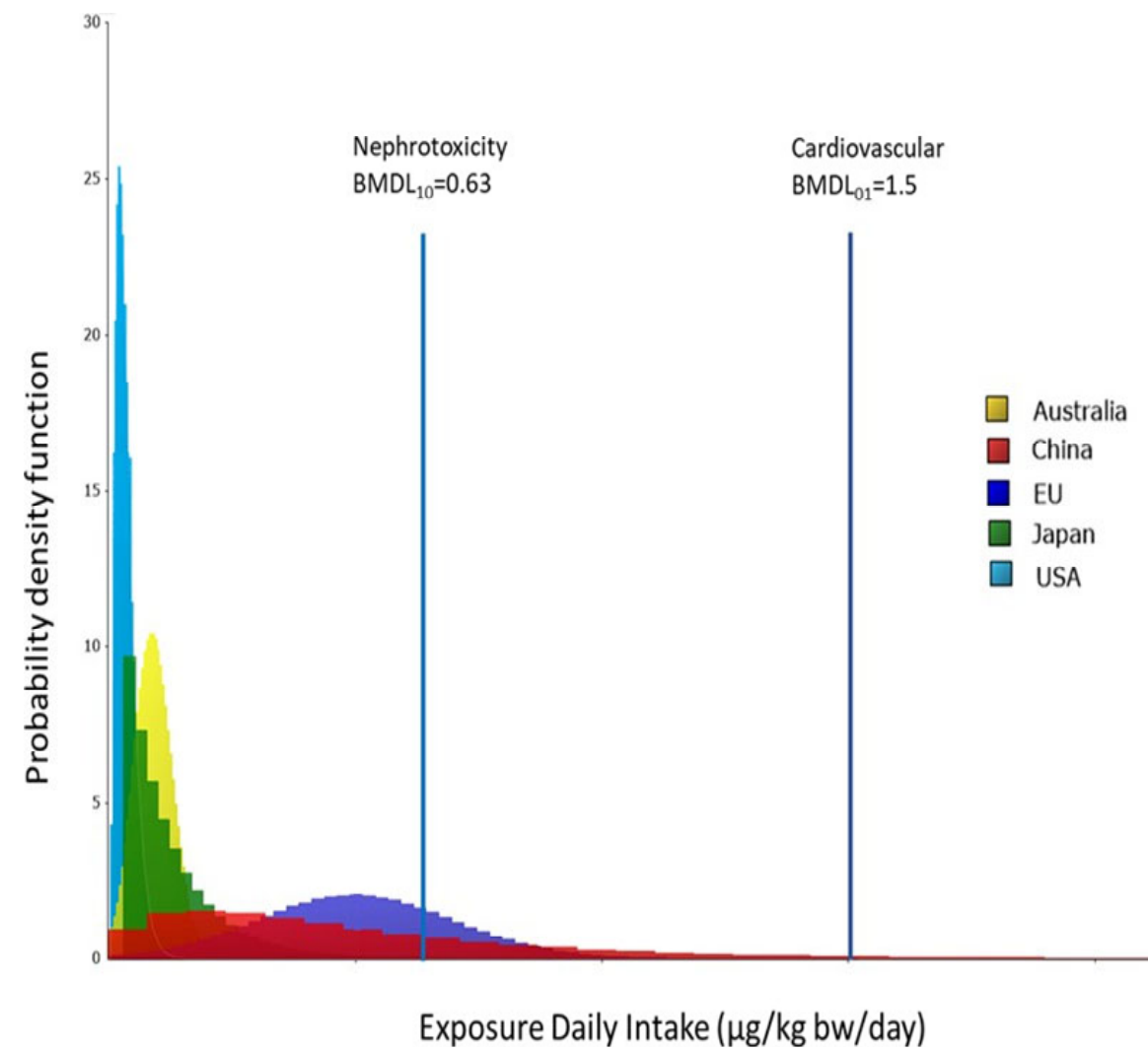


Fig. 4. EDI probability density function for Pb in different countries and BMDL01 for 1% increase in response for cardiovascular effect and BMDL10 for 10% increase in response for nephrotoxicity.

Table 1. Relationship between risk class, level of health concern and MOE associated with BMDL_{0.5} for lung cancer in humans exposed to iAs in food. Adapted from (SNFA, 2015)

Risk class	Concern level	MOE
1	High	< 1
2	Moderate-to-high	1 – 10
3	Low-to-moderate	10 – 100
4	No-to-low	100 – 1000
5	No	> 1000

Table 2. Adult exposure values to iAs and Pb ($\mu\text{g}/\text{kg}\text{-bw}$ per day) in total diet for various countries

Metal	Study Country	Mean exposure ($\mu\text{g}/\text{kg}\text{-bw}/\text{day}$)	95 th percentile ($\mu\text{g}/\text{kg}\text{-bw}/\text{day}$)	Source	EDI distribution function (5 th , 50 th , 95 th percentile)
iAs					
	Australia	0.049	0.12 (90 th)	FSANZ, 2019	Gamma (0.008;0.05;0.15)
	China (Hong Kong)	0.22	0.38	Wong et al., 2013	Gamma (0.08;0.22;0.38)
	EU	0.23	0.39	EFSA, 2014	Gamma (0.09;0.23;0.39)
	Japan	0.315	0.754	FSCJ, 2013	Gamma (0.07;0.27;0.83)
	USA	0.14	0.25	WHO, 2011a	Gamma (0.05;0.14;0.25)
Pb					
	Australia	0.089	0.14 (90 th)	FSANZ, 2019	Gamma (0.03;0.089;0.15)
	China (Guangzhou)	0.37	1.18	Wang, et al., 2019	Gamma (0.06;0.376;1.18)
	EU	0.5	0.83	EFSA, 2012	Gamma (0.18;0.5;0.83)
	Japan	0.095	0.319	Hayashi et al., 2018	Gamma (0.04;0.096;0.31)
	USA	0.03	0.06 (90 th)	WHO, 2011b	Gamma (0.01;0.03;0.07)

Table 3. Case study reference points: BMDL, defined for inorganic arsenic (iAs), type of damage (LC =lung cancer and LSBC=skin, bladder and lung cancer) and increased incidence (0.5% and 1%)

BMDL	Range of values ($\mu\text{g}/\text{kg}\text{-bw}/\text{day}$)	Damage	Source	Reference Point
BMDL(iAs, LC, 0.5)	2-7	Lung cancer (LC)	FAO/WHO, 2011	Uniform (2;7)

Table 4. Case study reference points: BMDL, defined for lead (Pb), type of damage (CV=Cardiovascular, NP=Nephrotoxicity) and the increased incidence (1% and 10%)

BMDL	Reference Point ($\mu\text{g}/\text{kg}\text{-bw}/\text{day}$)	Damage	Source
BMDL(Pb, CV, 01)	1.5	Cardiovascular	EFSA, 2010
BMDL(Pb, NP, 10)	0.63	Nephrotoxicity	EFSA, 2010

Table 5. MOE and POE results for inorganic arsenic (iAs) in five countries for two reference points: BMDL(iAs, LSBC, 01)=0.3-8 $\mu\text{g}/\text{kg}\text{-bw}$ per day (EFSA, 2009) and BMDL(iAs, LC, 0.5)=2-7 $\mu\text{g}/\text{kg}\text{-bw}$ per day (WHO, 2011a). Where LSBC=skin, bladder and lung cancer, LC=lung cancer and 0.5 and 01=increased incidence 0.5% and 1%, respectively

Country	RP	MOE			POE	
		5 th	Mean	95 th	Mean	Deviation
Australia	BMDL(iAs, LSBC, 01)	10.89	275.65	532.24	3.60E-06	2.21E-06
	BMDL(iAs, LC, 0.5)	24.50	313.15	554.27	0	0
China	BMDL(iAs, LSBC, 01)	3.02	36.48	59.62	1.45E-03	4.25E-05
	BMDL(iAs, LC, 0.5)	8.39	36.91	58.70	0	0
EU	BMDL(iAs, LSBC, 01)	2.90	27.33	54.50	1.71E-03	4.67E-05
	BMDL(iAs, LC, 0.5)	8.12	29.28	53.17	0	0
Japan	BMDL(iAs, LSBC, 01)	1.96	21.09	67.04	1.42E-02	8.86E-05
	BMDL(iAs, LC, 0.5)	4.39	22.87	66.07	1.08E-05	3.61E-06
USA	BMDL(iAs, LSBC, 01)	4.69	42.93	92.02	4.03E-05	6.85E-06
	BMDL(iAs, LC, 0.5)	12.92	46.65	90.03	0	0

Table 6. MOE and POE results for lead (Pb) in five countries for cardiovascular damage (CV) and nephrotoxicity (NP). Where, 01 and 10 are the increase incidence 1% and 10%, respectively

Damage/Reference point	Country	MOE			POE	
		5 th	Mean	95 th	Mean	Deviation
Cardiovascular BMDL (Pb, CV, 01) =1.5 $\mu\text{g}/\text{kg}\text{-bw}/\text{day}$	Australia	9.67	33.30	49.60	0	0
	China	1.27	13.95	25.18	1.84E-02	0
	EU	1.81	4.94	8.04	5.00E-07	5.27E-07
	Japan	4.70	18.82	42.86	3.00E-07	4.83E-07
	USA	21.03	61.18	140.70	0	0
Nephrotoxicity BMDL (Pb, NP, 10) =0.63 $\mu\text{g}/\text{kg}\text{-bw}/\text{day}$	Australia	4.06	13.99	20.83	0	0
	China	0.53	5.86	10.58	2.55E-01	0
	EU	0.76	2.07	3.38	2.58E-01	4.83E-07
	Japan	1.97	7.90	18.00	2.08E-03	5.16E-07
	USA	8.83	25.69	59.09	0	0