SURFACT

FSMA and SQF: temperature records now have to hold up at every handover

What FDA and SQF expect from shippers, carriers and receivers, and why automatic logging is the easiest way to deliver it.

THE RULES IN PLAY

FSMA Sanitary Transportation Rule IN FORCE

Shippers must give carriers a written operating temperature. On request from the shipper or receiver, the carrier must **demonstrate the temperature was maintained**, e.g. with time/temperature data taken during the shipment. Receivers must check for temperature abuse on arrival. Records can be electronic and must be producible within 24 hours.

FSMA 204 Food Traceability Rule 20 JUL 2028

Shipping and receiving become Critical Tracking Events with lot-level data. FDA can demand an **electronic, sortable record within 24 hours**. Temperature isn't a required data element, but every handover moves into digital records.

SQF Edition 10 2 JAN 2027

Loading, transport and staging (12.6.5) becomes a Core Clause. Set points and product temperatures must be **recorded** at loading and on arrival, not just monitored.

WHY AUTOMATIC RECORDS WIN

01 **Proof on request, not reconstruction.** When a shipper or receiver asks for evidence the cold chain held, a continuous log answers it in minutes.

02 **24 hours is the new response time.** FDA expects records within a day. Paper logs and printouts in a truck cab don't get there.

03 **One record across every handover.** Loading, transit and arrival on one timeline, instead of three systems owned by three companies.

04 **Claims get settled on data.** If product arrives out of spec, you can show where and when the cold chain broke, and who owned it at the time.

05 **Fewer audit findings.** Manual entries are where auditors find gaps. Under SQF Ed. 10 a major Core Clause finding costs 7 points.

WHAT'S ASKED AT EACH HANDOVER

LOADING

FSMA
Shipper specifies operating temperature; loader confirms pre-cooling.

SQF ED. 10
Set point checked and recorded; product temperatures recorded.

TRANSIT

FSMA
Carrier must show temperature was maintained when asked.

TODAY'S REALITY
Reefer return air and carrier data the shipper doesn't control.

ARRIVAL

FSMA
Receiver checks for temperature abuse. From 2028, receiving data per lot.

SQF ED. 10
Unit settings and product temperatures recorded before and during unloading.

Emma covers all three: one device in the shipment, one continuous temperature record from loading dock to receiving dock.

HOW SURFACT HELPS

Put Emma in the load. The record builds itself.

- Logs automatically from loading to arrival. No probes, paper or manual entries
- Works on any trailer, including third-party carriers, without touching their systems
- No installation. Drop it in and ship
- Wireless and pharma-grade. Data is shared live, not downloaded after the fact
- Measures the cargo itself, not just reefer return air
- Made from recycled ocean plastic



Neither FSMA nor SQF Edition 10 mandates continuous in-transit logging. Both raise the bar for temperature evidence at every handover, and automatic records are the simplest way to meet it. Sources: 21 CFR 1.908 and 1.912; FDA Food Traceability Rule (21 CFR Part 1, Subpart S); SQF Code Edition 10.