



Specialized Products Determination Guidance

08/21/2026

Under [Chapter 45a-101-10\(a\) Specialized Product Regulation](#), all retailers selling specialized products in the State of Utah must obtain the new **Specialized Products Retailer License (SPRL)**. Additionally, every specialized product sold at the retail location must be reported to the Utah Department of Agriculture and Food (UDAF).

Use the following step-by-step guidance to determine if a product that you sell or that you want to sell falls into the category of a "Specialized Product" as per state law. If any product you sell meets the requirements below, you must obtain an SPRL.

Important: If a specialized product is not reported to UDAF, it **cannot** be legally sold in the state. Each individual retail location must carry its own SPRL and must report its products individually.

Examples of specialized products

Here are some examples of types of products that a store may carry that could fall into the category of specialized products. This is not intended to be an inclusive list:

Mad and Royal Honey, Amanita muscaria, functional mushroom products, Blue Lotus, Kava, Kanna, Ibogaine, Tianeptine, nootropics and cognitive enhancers, natural stimulants and energy products, relaxation and sleep aids (including melatonin gummies), naturopathic pain relievers, mood stabilizers, natural sexual enhancement products, and more.

NOTE: Specialized products do not include alcohol or alcohol products, FDA approved prescription drugs, or over the counter drugs.

Step 1: Filter Out "Definitely Regulated" Items

Check if you carry any of these specifically named products. If you do, you automatically require the SPRL license, and these products must be reported to UDAF:

- **Cannabinoids:** Any hemp-derived cannabinoid products (e.g., CBD, Delta-8, Delta-9).
- **Kratom:** Any products containing kratom (*Mitragyna speciosa*).
- **Tobacco/Nicotine:** All tobacco products, electronic cigarettes (vapes), or nicotine products and substances

Step 2: Check the "Intended Effect"

A product with a "Not GRAS" (Generally Recognized As Safe) ingredient only triggers this law if it is also marketed to change how a person feels.

If the product is **known or intended** to have one of the following effects, it is likely a specialized product. Look at the packaging for keywords like the ones listed below, and/or phrases or pictures that intend to convey a similar meaning:

- **Psychoactive (Affecting the mind or behavior):**
 - "Mood boosting, "Energy"," "Mind altering", "Performance enhancing," "Cerebral," "Expands the mind," "Elevated state," "Perception shifting," "Head heavy," "Visionary," "Psychotropic," "Mind-expanding," or "Cognitive shift."
- **Euphoric (Marked by a feeling of great happiness and excitement; producing euphoria):**
 - "Blissful," "Feel-good," "Joy-inducing," "Elevating," "Cloud nine," "Mood elevating," "Uplifting," or "Ecstatic."
- **Analgesic: (Used to relieve pain and produce diminished sensation without loss of consciousness):**
 - "Pain relief," "Anti-inflammatory," "Soreness support," "Tension relief," "Soothing," "Numbing," "Physical relief," "Deep comfort," "Eases discomfort," or "Muscle easing."
- **Sedative: (Tending to calm, moderate, or tranquilize nervousness or excitement):**
 - "Sleep aid," "Deep rest," "Heavy relaxation," "Tranquilizing," "Unwind," "Nighttime blend," "Calming," or "Couch-lock."
- **Intoxicating: (To excite or stupefy, especially to the point where physical and mental control is markedly diminished):**

- "Potent," "Inebriating," "Hard-hitting," "Buzzed," "Impairing," "Stoned," "Faded," "Psychedelic," or "Legal high."

Step 3: Identify "Red Flag" Ingredients

For any products that are known or intended to provide one of the effects found in Step 2, you must check the ingredients on the label to see if the FDA has declared them Generally Recognized as Safe (GRAS).



1. **Action:** Search the FDA's [Substances Added to Food Inventory](#) (Safe List). This database includes thousands of safe, standard ingredients like vinegar, salt, and standard vitamins.
 - a. If the ingredient in question is not on the FDA's [Substances Added to Food Inventory](#) (Safe List) then the product is a specialized product and it needs to be reported to UDAF
 - b. If the product doesn't list its ingredients or lists an ingredient as proprietary (or other similar statement), then the product is a Specialized Product and must be reported to UDAF.

The Simple Rule: If the bottle says it will help with pain, sleep, or mood or something similar (See Step 2) **AND** an ingredient is not on the FDA safe list (Step 3), it is a Specialized Product and must be reported to UDAF.

Step 4: Final Inventory Action Plan

- **If you sell these items:** You must apply for the SPRL and pay the appropriate fee. You must also submit a full, comprehensive specialized product list to UDAF.
- **If you do NOT sell these items:** You do not need the license. However, if you add any new products to your inventory later, you must re-run this 4-step check at least **7 days** before putting the item on the shelf.

Flow Chart

