

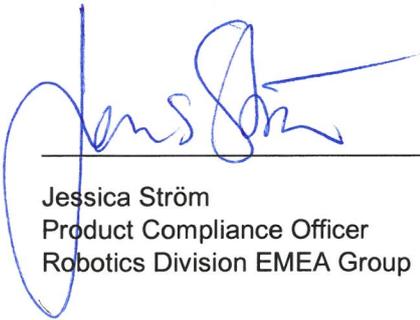
Hattersheim, 13-oct-2025

**Yaskawa Industrial robots are out of RoHS2 scope**

We, Yaskawa Europe GmbH Robotics division, understands that from the definition described in the European commission's directive, 2011/65 RoHS2, for restriction of hazardous substances in electrical and electronic equipment, our products are legally out of RoHS2 scope for the reason described on the next page.

This applies to any products or the industrial robots corresponding to any of the following models:

DX100, DX200, FS100, YRC1000, YRC1000 micro and YNX1000.



---

Jessica Ström  
Product Compliance Officer  
Robotics Division EMEA Group

Yaskawa Europe GmbH  
Philip-Reis Strasse 6  
657 95 HATTERSHEIM  
GERMANY

**Reasons that Yaskawa's industrial robots are out of RoHS2 scope:**

EU regulation 2011/65, Article 2 p 4

This Directive does not apply to:

- (d) Large-scale stationary industrial tools;
- (e) Large-scale fixed installations

EU regulation 2011/65 Article 3 Definitions

(3) large-scale stationary industrial tools means a large-scale assembly of machines, equipment, and/or components functioning together for a specific application, permanently installed and de-installed by professionals at a given place.

(4) large-scale fixed installation means a large-scale combination of several types of apparatus and, where applicable, other devices, which are assembled and installed by professionals, intended to be used permanently in a pre-defined and dedicated location, and de-installed by professionals.

As mentioned in the EU FAQ on 2011/65 ([Synopsis of Questions to be Answered 20](#)), released on 12-dec-2012, examples of large-scale fixed installation (benefiting from an exclusion)

- Production and processing lines, including robots and machine tools (industrial, food, print, media etc.)
- Passenger lifts
- Conveyor transport systems
- Automated storage systems
- Electrical distribution systems such as generators
- Railway signaling infrastructure
- Fixed installed cooling, air conditioning and refrigerating systems or heating systems designed exclusively for non-residential use

Examples of large-scale stationary industrial tools (benefiting from an exclusion):

- Machines for the industrial production and processing of materials and goods, such as o CNC lathes.
  - Bridge-type milling and drilling machines
  - Metal forming presses
  - Newspaper printing presses
- Machines for the testing of work pieces, such as
  - Electron beam, laser, bright light, and deep ultraviolet defect detection systems
  - Automated integrated circuit board and printed wiring board testers
- Cranes
- Other machinery of similar size, complexity and weight.

The following guidance metrics and qualitative criteria can be applied for installations. If the installation exceeds the minimum requirements for one of the following criteria, it can be considered large-scale:

- If, when installing or de-installing the installation, it is too large to be moved in an ISO 20-foot container because the total sum of its parts as transported is larger than 5,71m x 2,35m x 2,39m, it can be considered large-scale.

A robot is defined as partly completed machinery according to Machinery directive 2006/42/EU. This means that the robot is always included in the production or processing lines. The case of standalone operation of the robot is no need to be considered.

As a conclusion based on the above information, Yaskawa industrial robots are considered as a part of large-scale fixed installations and thus we determine they are legally out of RoHS2 scope.