

July 1, 2016

**DIRECTIVE 2011/65/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL  
of 8 June 2011  
on the restriction of the use of certain hazardous substances (RoHS) in electrical and  
electronic equipment**

Dear Sir or Madam:

**Based on the information in Section 3 (Scope-Large-Scale Exclusions) of the RoHS 2 FAR –**

**UIC “Pick & Place” machines are excluded from the RoHS 2011/65/EU directive requirements.**

**Background:**

UIC “Pick & Place” equipment is subject to the RoHS requirements in the 2011/65/EU directive as explained in the 12 December 2012 RoHS 2 FAQ (Frequently Asked Questions) document.

Large scale industrial tools & large scale fixed installations are covered in the exclusions list in Annex I of the directive. UIC’s pick and place equipment is covered by item 6 and/or 11 of this list.

**Discussion:**

The FAQ guidance notes explains that "large-scale" in the directive is used in the definition of both machinery and installations. That is that various machinery, components, etc. which are designed for permanent use at a specific place and are installed and de-installed by professionals are considered large-scale. Furthermore, these tools/machines can either be in a stand-alone or assembly configuration and they often have moving parts that are used in the treatment/manufacturing of materials and work pieces.

A "large-scale" tool is defined to be:

- An assembly of machines, equipment and/or components, functioning together for a specific application;
- Permanently installed and de-installed by professionals at a given place;
- Used and maintained by professionals in an industrial manufacturing or R&D facility;

When non-specific “Pick & Place” equipment, components and sub-assemblies are being brought together or combined and placed on the market as a single piece of equipment/manufacturing process line, the decision on whether the equipment can be included within the large-scale exclusion scope of RoHS, is to be taken on a case-by-case basis.

Sincerely,



**Richard Strube, CMSE<sup>®</sup>**

Sr. Product & Safety Code Compliance Engineer  
Certification No.: 44 506 15 441878 039

**Customer Support Center**  
T: +1 (800) 842-9732 or  
T: +1 (607) 779-5000

**AMERICAS**  
T: +1 (800) 432-2607 or  
T: +1 (607) 779-7522

**CHINA, SHENZHEN**  
T: +86-755-2685-9108

**CHINA, SHANGHAI**  
T: +86-21-6495-2100

**EUROPE**  
T: +421-2-4930-96-60

**www.uic.com**  
email: [universal@uic.com](mailto:universal@uic.com)

**Universal Instruments Corporation** Corporate Headquarters • 33 Broome Corporate Parkway • Conklin, NY 13748