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Consultations, calls, events

2 EU consultations on Fertilising Products Regulation

Open to 11th September 2025. Two public consultations to evaluate functioning of the EU Fertilising Products Regulation (FPR), 2009/1009, in force since July 2022: call for evidence and public questionnaire.

The FPR requires (art. 49) that by July 2026 the European Commission report to Parliament and Council on the application and impacts of the FPR, in particular: impacts on SMEs, impacts on markets and trade, review on cadmium limits, review on other contaminants. The published consultation documents state that the evaluation will specifically look at: effectiveness of the FPR, coherence, EU added value. The consultation questionnaire asks for example whether the DPR has improved safety of fertilisers, facilitated innovation in recycling, increased market availability of recycled and bio-based fertilisers, improved environmental protection and reduced contaminants to soil (specifically: cadmium, uranium), improved communication to users, reduced dependence on imports, impacted fertiliser price and availability ...

ESPP previously input to a first stakeholder survey on this question in January 2024 noting:

- Need to simplify the FPR
- Confusion about "post processing" of CMC materials
- Complexity of Conformity Assessment
- Obstacles to use in EU fertilising products of Animal By-Products
- Lack of coherence with other regulations (ABPs, Nitrates, REACH, Ecolabelling ...)
- Need to facilitate EU-recognition of existing nationally authorised fertilisers

Today, it seems that the FPR is not working for recycled and organic fertilisers. There is no list of products having obtained FPR CE-certification, and it seems that very few recycled products have done so (most CE-mark products are 'self-certified' mineral fertilisers, which were already covered by the previous regulation 2006/2006). At a recent meeting convened by ESPP to consider establishing such a list, to promote recycled CE-mark fertilisers, industry federations said they did not want such a list as most of their members consider that the FPR excludes or is not relevant for their products.

The FPR, now in force for three years, has today a 70 page "FAQ" guidance document published by the European Commission to help industry and Member States authorities understand it (with a further 10-15 pages still under discussion). ESPP recognises and is very grateful for the considerable efforts and commitment of the Commission staff DG GROW) to help operators through this document, but suggests that so much explanation maybe signifies a structural problem of complexity of the FPR itself.

ESPP considers that an important problem of the FPR is that the list of CMCs (Component Material Categories) is strictly limited, so that any new residue stream or processing method is de facto not covered, so requires a long and complex



administrative process, and considerable scientific and market data, to be possibly included. This does not correspond to reality, as many organic residue streams suitable for nutrient recycling to fertilisers are site-specific and variable, and innovation in circularity and in the agri-food and bio-materials sectors is constantly resulting in new residue streams. ESPP therefore proposes to input to the current evaluation consultations underlining the need to considerably simplify the "CMC" process, to facilitate FPR validation for secondary materials.

Based on the above, over the next two months, ESPP will consult our members and stakeholder network to define ESPP's input to these FPR evaluation consultations. **If you wish to participate in this discussion**, please contact info@phosphorusplatform.eu

Two EU public consultations, open to 11th September 2025":

- 1) "Call for Evidence" (input = 4000 characters text plus optional attached document)
- 2) Questionnaire "Public consultation for the evaluation of the Fertilising Products Regulation (Regulation (EU) 2019/1009)"

Both here: https://eur-lex.europa.eu/initiatives/14365-Fertilising-Products-Regulation-evaluation_en
Consolidated EU Fertilising Products Regulation (FPR) 2002/1009 https://eur-lex.europa.eu/eli/reg/2019/1009 Note that CMC11 "By-Products" is not consolidated and must be read separately https://eur-lex.europa.eu/eli/reg/del/2022/973

EU consultation on CAP simplification (Common Agricultural Policy)

Open to 1st August 2025. See ESPP eNews n°97. https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14704-Simplification-of-the-implementation-of-CAP-Strategic-Plans_en

EGTOP EU Organic Farming call for experts

Call open to 25th July 2025 for candidates as experts for the EU official advisory group on certified Organic Farming EGTOP (expert group for technical advice on organic production). The call for candidates aims to renew entirely the EGTOP committee and create a reserve list of experts as replacements and to participate in sub-groups. Experts are selected for four years. Criteria include ten years of technical, scientific and/or professional experience relevant to Organic Farming, relevant university education.

Call for candidates for the EU Expert Group for Technical Advice on Organic Production (E03794), deadline for application 25th July 2025. Call: https://ec.europa.eu/transparency/expert-groups-register/screen/expert-groups/consult?lang=en&groupID=3794

Sign the joint stakeholder call for nutrients in the EU Circular Economy Act

Joint call still open for signatures to mid-July.

To sign contact ESPP info@phosphorusplatform.eu, specifying your organisation name, signatory contact, logo.

ESPP has also prepared detailed technical input, addressing nutrient circularity in a wide range of regulations and policies www.phosphorusplatform.eu/regulatory

Joint call for nutrients in the EU Circular Economy Act". Sign now! www.phosphorusplatform.eu/regulatory

DPP P-recycling German thesis prize

DPP, the German Phosphorus Platform, is for the third year offering a 1000 € prize for a German bachelors or masters thesis on phosphorus recycling. The degree must have been obtained in Germany. The prize will be attributed at DPP's annual meeting (DPP Forum), Frankfurt-am-Main, 8th October 2025. The first (2023) DPP thesis prize was awarded to Jannik Mühlbauer (TU Dresden) for his thesis on thermochemical sewage sludge treatment. The second (2024) DPP thesis prize was awarded to Marcia Beste of Braunschweig Technical University for her thesis on phosphorus recovery by struvite precipitation after biological phosphorus remobilisation.

Application (letter of motivation max. 1 page, CV, diploma, supervisor's report, in one pdf file) plus the final thesis (separate file), must be sent by 1st September 2025 to info@deutsche-phosphor-plattform.de

DPP Forum, 8th October 2025 https://www.deutsche-phosphor-plattform.de/aktuelles-forum/

Call for engineering services for P removal structures in Ohio (USA)

The Ohio Department of Agriculture has published a request for proposals for an engineering services provider to support the implementation of phosphorus removal structures on agricultural land. Deadline: 1st August 2025.

This action is part of Ohio's H2Ohio initiative, which aims to reduce phosphorus losses from cropland and improve water quality, particularly in fields with high soil P. Selected provider will work with ODA to identify eligible sites, design and oversee the installation of P removal structures, and carry out post-installation inspections to ensure functionality.

Phosphorus Removal Structures Program - Professional Engineering Services solicitation, deadline for application 1st August 2025: https://ohiobuys.ohio.gov/page.aspx/en/bpm/process_manage_extranet/43274



Norway call for to collate knowledge for aquaculture and feed circularity

Norway Research Council call to summarise knowledge and identify data gaps relevant for regulation of sustainable aquaculture and feed for livestock or for fish farming. This may include: fish sludge, manure or kitchen/food waste as substrate for production of insects to be used in animal or fish feeds; various raw materials as substrates for cultivation/fermentation of unicellular organisms; risks of transmission of infection between species and fate of pharmaceuticals and algal toxins in integrated multitrophic aquaculture. The budget is planned for one project of up to 3 million NOK. Only approved Norwegian Institutes can apply, but non-Norway organisations can be project partners.

Call deadline: 13h on 24th September 2025

https://www.forskningsradet.no/utlysninger/2025/kunnskapsgrunnlag-regelverksutvikling-barekraftig-for-husdyr/

Sustainable Phosphorus Alliance and STEPS Phosphorus Forum

The 7th Annual Phosphorus Forum, organised by the Sustainable Phosphorus Alliance and the STEPS Center, will take place in Raleigh, North Carolina (USA), 17-18 September 2025. The conference will address key challenges and innovations in sustainable phosphorus management, including emerging contaminants in the circular bioeconomy, valorisation of food waste for renewable phosphorus, strategies to manage legacy phosphorus in agriculture, the evaluation of novel plant nutrition products, and improving resilience in enhanced biological phosphorus removal systems.

The Phosphorus Forum 2025 will be held in person only in Raleigh, NC, on September 17-18, 2025: https://specialevents.asu.edu/website/78672/

Removing barriers to innovation in WWTPs

The ReLEAF and UPSTREAM projects are gathering input on key messages to support the transition of wastewater treatment plants (WWTPs) into circular economy hubs for resource recovery. Short-term public procurement contracts, rigid legislation, and limited public awareness continue to hinder the adoption of innovative technologies in wastewater treatment plants. Even when solutions are technically mature, their implementation is delayed by a lack of long-term planning and insufficient collaboration between research and industry. Both projects highlight the need to extend contract durations, allow for real-world pilot testing, and foster greater public engagement as critical steps toward a more sustainable and circular water sector.

 $\label{lem:problem:p$

Italy launches National Phosphorus Database

The Italian Phosphorus Platform has launched the National Phosphorus Database to support more sustainable phosphorus use and recovery across the country. The database is developed and managed by ENEA (the Italian National Agency for New Technologies, Energy and Sustainable Economic Development), with funding of the Italian Ministry of Environment and Energy Security (MASE). The database maps phosphorus flows across the supply chain, including users, waste producers, and treatment plants. It currently includes data from over 150 companies, 50 treatment facilities, and 500 phosphorus-containing resources. Searches can be filtered by region, province, and ATECO code (the Italian classification of economic activities, comparable to NACE in the EU), enabling targeted analysis of phosphorus availability and demand. The database is open for contributions from companies, public entities, and other stakeholders wishing to share relevant data and support more coordinated phosphorus management at national level.

Database Nazionale Fosforo: https://database.piattaformaitalianafosforo.it/

ESPP new member

Norge Mining - P4 Project



Norge Mining

Norge Mining is an Anglo-Norwegian critical raw materials company with a diversified portfolio of activities, planning to supply low-emissions, ESG*-compliant EU Strategic and Critical Raw Materials including phosphates and P_4 . The company owns extraction rights over 4.6 billion tonnes of JORC*-complaint resources of igneous rock containing phosphate and other EU Critical Raw Materials in Eigersund, Norway. Norge Mining has plans to develop a greenfield white phosphorus (P_4) plant in the EU, thus creating the only production plant of this critical raw material in Europe. Since the last P_4 production facility in Europe closed in 2012, the EU is 100% import-dependent for this Critical Raw Material, largely from Kazakhstan and Vietnam. P_4 is supplied to Europe via long and complicated supply routes, and produced under unclear ESG* standards (including contaminated by-products and CO_2 emissions). The planned production of P_4 by Norge Mining in the EU will therefore help Europe secure this critical component for important

industries including chemicals, plastics and composites, fire safety, food and pharma, electronics and batteries. The plant will



adhere to the highest ESG* standards by using igneous phosphate rock as the key input (low in toxic contaminants and heavy metals, such as cadmium), and adopting CO₂-neutral production technologies (using green electricity and CCUS* for emissions).

* ESG = Environmental, Social, and Governance. JORC = Australasian Code for Reporting of Exploration Results, Mineral Resources and Ore Reserves. CCUS = Carbon Capture, Utilization and Storage.

Norge Mining https://www.norgemineraler.com/en/company/nm-limited/ and its Norge Mineraler project https://www.norgemineraler.com/en/project/our-assets-minerals/

Policy

Ash-recovered calcium phosphates authorised in Organic Farming

"Calcium phosphate ... derived from sewage sludge ash" have been added to the list of authorised fertilisers for EU certified Organic Farming, subject to being registered as EU Fertilising Products (under 2009/1009). ESPP welcomes this authorisation, which will support certified Organic Farming's circularity principles and help improve Organic productivity (many Organic farms suffer from a phosphorus deficit, see <u>ESPP SCOPE Newsletter n°149</u>) and will contribute to stewardship of the EU Critical Raw Material "Phosphate Rock" and to EU Circular Economy objectives.

Precipitated phosphate salts, including struvite, recovered from sewage, are already authorised in EU certified Organic Farming since 2023 (ESPP eNews n°73).

ESPP notes that the wording "calcium phosphate" is generally considered to mean any inorganic compound consisting of calcium, phosphorus, hydrogen and oxygen, e.g. monocalcium phosphate, dicalcium phosphate, octacalcium phosphate, amorphous calcium phosphates, hydroxyapatite, single super phosphate, triple super phosphate. Some of these compounds are highly water soluble. This however contradicts the EGTOP Opinion (Expert Group on Organic Farming) of March 2024 (ESPP eNews n°87), cited in the Implementing Regulation Recital (8) which was largely based on the EasyMining (Ragn Sells) Ash2Phos process, and emphasises the importance of low water solubility.

ESPP regrets that "calcined phosphates" from ash are still not yet authorised in EU certified Organic Farming, despite a positive opinion from EGTOP in 2016.

"Commission Implementing Regulation (EU) 2025/973 of 23 May 2025 amending and correcting Implementing Regulation (EU) 2021/1165 authorising certain products and substances for use in organic production and establishing their lists" https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L 202500973

"EU approves recycled phosphorus for use in organic farming", Ragn Sells press release, 9th June 2025 https://newsroom.ragnsells.com/posts/pressreleases/eu-approves-recycled-phosphorus-for-use-in-or

EU implements limited tariffs on fertilisers from Russia and Belorussia

The EU has adopted a c. 13% tariff on some fertiliser imports directly or indirectly from Russia and Belarus, increasing to c. 100% by July 2028 and extended tariffs on some other agricultural products (see detail in <u>ESPP eNews n°94</u>). The text, largely as proposed by the Commission in January this year, has been validated by the European Parliament and Council and <u>published</u> in the Official Journal. These tariffs are on top of the existing 6.5% on all fertiliser imports.

ESPP notes that the proposed tariffs on fertilisers are relatively low and will have a limited impact until June 2028. This means that significant financial flows - potentially exceeding a billion euros - may continue towards Russia for fertiliser purchases, including through taxpayer-funded CAP support for farmers.

ESPP also regrets that straight phosphate fertilisers are not covered by the tariffs (NP and NPK fertilisers are covered). Currently, around 25% of EU phosphates fertiliser imports and 30% of phosphate rock imports still come from Russia (see expertise by Alberto Persona, Fertecon – S&P Global for ESPP detail in ESPP eNews n°96).

EU Regulation 2025/1227 of 17th June 2025 "on the modification of customs duties applicable to imports of certain goods originating in or exported from the Russian Federation and the Republic of Belarus" https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L 202501227

European Water Resilience Strategy published

The Commission adopted its new Strategy to restore and protect the water cycle, which includes references to nutrient management and pollution, acknowledging their role in achieving water quality and circularity objectives. The Strategy, adopted on 4 June 2025, also aims at promoting the EU's water industry and secure clean and affordable water and sanitation. ESPP contributed to the consultation in March 2025, highlighting links between water resilience and nutrient management, in particular the role of fertiliser use in the context of climate change. ESPP underlined the potential of the water sector to embrace circular economy approaches, such as fertigation and water reuse, which are closely tied to achieving the EU's objectives on nutrient circularity. We also emphasised that pollution prevention at source, as for the case of PFAS, is essential for enabling water reuse, nutrient recovery, and the safe circularity of other materials recovered from wastewater.

Several of ESPP's key points are addressed in the published Strategy:



- It recognises the need to tackle pollutants (including PFAS and microplastics) that threaten vital drinking water sources and marine environments. It emphasises the necessity of cleaning up sites heavily polluted by persistent, bio-accumulative, and toxic substances, applying the polluter pays principle. The text highlights the potential of research and innovation, including novel bio-based technologies promoted in the Bioeconomy Strategy, to reduce de-polluting costs.
- It states that limiting nutrient pollution in aquatic ecosystems is central to restoring water quality. Nutrients from agriculture, urban areas, and other sources threaten human health and biodiversity, causing algal blooms and oxygen depletion. The economic cost of nitrogen pollution alone is estimated at €75–485 billion per year. The Commission calls for urgent action "from source to sea," including improved implementation of the Nitrates Directive.
- It promotes integrated nutrient management through existing platforms, funding for manure storage, and nutrient circularity to reduce reliance on synthetic fertilisers. These efforts align with the EU's "Vision for Agriculture and Food" and support more sustainable and extensive livestock production in nutrient hotspots. It also highlights the role of the Common Agricultural Policy (CAP) and national Strategic Plans in supporting water-efficient and circular agricultural practices, such as precision farming, water reuse, improved soil and nutrient management, and organic farming. The Commission stresses that Member States should fully use these tools to promote water-resilient farming and confirms that these priorities will continue in the next programming period.
- The Commission will support Member States in defining tailored nutrient reduction targets, using improved modelling, interactive mapping, and best practice exchange, and will launch an "Assistance Toolbox" to help Member States reduce nutrient pollution, supported by technical tools and knowledge sharing.

European Water Resilience Strategy, 4.6.2025 https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14491-European-Water-Resilience-Strategy en

Commission Recommendation of 4.6.2025 on guiding principles of water efficiency first, https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14490-Water-Efficiency-First-guiding-principles en

ESPP input to EU call for evidence on Water Resilience Initiative 4_3_25

Clean Industrial Dialogue shows orientations for EU Circular Economy (CE) Act

European Commission indicates possible measures including on End-of-Waste, Extended Producer Responsibility, public procurement, recycled and bio-based product content of products, P recycling from sewage, VAT and taxes. The preparatory documents for the 'Clean Industrial Dialogue on Circularity', as part of the Clean Industrial Deal emphasis on the circular economy (see ESPP eNews n°96), state that the aim is adoption of the Circularity Act in 2026 to facilitate the market for secondary raw materials and waste, including demand and supply measures and simplification of administrative burdens. Possible actions (relevant to nutrient recycling) indicated include: reforming and improving harmonization across the EU of End-of-Waste criteria, expanding Extended Producer Responsibility (ESPP note: to collect fees to cover recycling costs), criteria for circularity in public procurement, recycled and bio-based content in certain products (ESPP comment: presumably means recycled/bio-based content obligations or "quotas"), improved bio-waste collection and use, phosphorus valorisation from sewage sludge (ESPP comment: this is already addressed in the revised Urban Waste Water Treatment Directive, see ESPP SCOPE Newsletter n°156), reducing incineration and landfill, actions on taxes in particular for VAT on product recycled content.

ESPP input to EU bioeconomy consultation

ESPP input on revision of the EU Bioeconomy Strategy, nutrient stewardship for biomass production, to reduce nutrient losses, develop recycling, and reduce EU import dependence of the Critical Raw Material phosphorus. ESPP's detailed input calls to:

- · Recognise nutrient recycling as a strategic priority,
- Support targeted R&D for reactive nitrogen recovery as economically viable products, including investigating production of compressed ammonia gas.
- Develop harmonised CEN standards for defining and assessing bio-based nutrient content;
- · Encourage traceability and producer responsibility schemes for bio-based materials and recycled nutrients,
- Support research into prion safety for phosphorus recovery from Category 1 ABP incineration ash,
- · Support research and pilot testing of innovative processes to prepare inclusion into IED BAT BREFs,
- Support scale-up to full-scale for "first innovator" industrial plants and regional flagship demonstration sites,
- Update the Animal By-Products Regulation to facilitate safe circularity,
- Strengthen data and knowledge tools on nutrient flows and recycling potentials,
- Undertake a strategic assessment of nutrient supply risks for EU food sovereignty,
- Develop data for phosphorus required by the Critical Raw Materials Act,
- Ensure long-term support for bioeconomy coordination platforms.
- Promote training and capacity-building,
- Support markets by public procurement policies,



- Improve market conditions for recycled products. See proposals for 'market pull' policies here,
- Support a risk-based approach for contaminants in nutrient-rich materials,
- Promote regulatory coherence across EU frameworks.

EU 'Have your Say' consultation website "Towards a circular, regenerative and competitive bioeconomy", consultation closed 23 June 2025 https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14555-Towards-a-circular-regenerative-and-competitive-bioeconomy en ESPP input www.phosphorusplatform.eu/regulatory (under "ESPP input to thematic consultations").

Water industry

Cefic flags Kemira coagulants as exemplary recycling

In its report on chemicals industry circularity, the European Chemical Industry Council (Cefic) showcases Kemira (ESPP member): 44% of Kemira's wastewater coagulants used for P-removal are from wastes or by-products.

Secondary sources of iron used by Kemira for its coagulants include spent acids and 'pickle' liquor from metal treatment, steel and chemical industries and secondary ferrous sulphate. Kemira has identified, tested and has now started mining landfill accumulated over thirty years from unused side-streams of a titanium dioxide plant, with potential to recover millions of tonnes of ferrous sulphate. Kemira also uses secondary sources of aluminium for its P-removal coagulants, including by-products from aluminium production, chemicals, spent catalysts, metal finishing, silica processing and pharmaceuticals production.

"Accelerating the circular transformation: insights, challenges and pathways for the chemical industry and beyond", Cefic (European Chemical Industry Council) and UNITY, 17th June 2025, 34 pages, https://www.unity-consulting.com/en/news/circularity-study-accelerating-the-circular-transformation/ - see Example Box 2, page 16.

Kemira coagulants for water treatment Inorganic coagulants for water treatment - Kemira

Research

Obstacles to commercial development of algae in Europe

25-page report from EU R&D project EU4Algae identifies extensive and wide-ranging obstacles to roll-out of algae production including contamination, inefficient technologies, labour and costs, market uptake and regulations. The report covers all types of algae, from microalgae in photobioreactors to harvested seaweeds. Demand is indicated to be often driven by sustainability objectives but can also be economic (e.g. algal production of omega 3 lipids for human or animal feed). Light energy and nutrient inputs are noted as key factors for efficient algae production. The potential of using algae for waste water treatment (and so nutrient recovery and recycling) or bioremediation is noted. Obstacles preventing commercial development of algae production are identified as: skills and labour costs (especially in Europe) because processes are small-scale and labour intensive, logistics and related costs (small-scale, scale-up issues, need for rapid on-site processing), inefficient technologies, regulatory authorisation dossier costs, producers' lack of understanding of markets, user awareness and regulatory obstacles or complexity. The report notes the absence of a 'vertical regulatory framework' for algae and recommends streamlining of algae-based product authorisation procedures, development of standards for algae-based products and algae production.

"Bottlenecks limiting the development of the algae sector", EU4Algae, January 2025, DOI

High phosphorus in diets may cause hypertension via brain hormone changes

Rats fed high phosphate diet (2x normal) showed increased FGF23 hormone, crossing from blood to brain, and increased blood pressure linked to muscle activation (exercise). Rats were fed either 0.6% P (normal) or 1.2% P (high) diet for 12 weeks. The rats on high P diet showed increased blood serum and brain levels of FGF23, a hormone linked to blood phosphorus homeostasis, and also increased brain calcineurin. The high P diet rats also showed higher increases in arterial blood pressure and renal sympathetic nerve activity in response to hind leg muscle stimulation (compared to normal P diet rats). Injection of FGF23 receptor inhibitors suggests that this hypertension was partly related to FGF23 levels. Other rats on normal diet were used to demonstrate transport of FGF23 hormone transfer from blood serum to the brain, using injected radiolabelled FGF23, showing transfer to the choroid plexus and medulla oblongata. The authors hypothesise that high P diets in rats lead to hormonal changes in the brain, in particular for FGF23 and calcineurin levels, which lead to increased blood pressure. The authors underline that these results in rats many not transpose to humans.

"High Dietary Phosphate Intake Induces Hypertension and Sympathetic Overactivation Through Central Fibroblast Growth Factor Receptor Signaling", H-K. Kim et al., Circulation. 2025;152, DOI



ESPP members



Stay informed

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Slideshare presentations: https://www.slideshare.net/phosphorusplatform

YouTube https://www.youtube.com/user/phosphorusplatform