



Organogenesis Inc.

June 13, 2002

Dockets Management Branch (HFA-305)
Food and Drug Administration
Department of Health and Human Services
5630 Fishers Lane, Room 1061
Rockville, MD 20852

5638 02 JUN 14 10:47

NOTICE OF PARTICIPATION

Docket No. 02N-0169

Under 21 CFR part 12, please enter the participation of:

Michael L. Sabolinski, M.D.
Organogenesis Inc.
150 Dan Road
Canton, MA 02021
(781) 575-0775

Service on the above will be accepted by:

Organogenesis Inc.
150 Dan Road
Canton, MA 02021
(781) 575-0775

The following statements are made as part of this notice of participation:

A. Specific interests

I am filing this notice of participation at the public hearing on Combination Products Containing Live Cellular Components (Docket No. 02N-0169). I will be presenting on behalf of Organogenesis Inc., and request that FDA allow 15 minutes for my presentation. Please see Summary Statement attached detailing my specific interests in this public hearing.

B. Commitment to participate

Michael L. Sabolinski, M.D., representing Organogenesis Inc., will present testimony at the hearing and will comply with the requirements of 21 CFR 12.85.

Sincerely,

Michael L. Sabolinski, M.D.
Executive Vice President,
Medical and Regulatory Affairs

02N-0169

APE16

Organogenesis Inc.

SUMMARY STATEMENT

Combination Products Containing Live Cellular Components; Public Hearing

Docket No. 02N-0169

Michael L. Sabolinski, M.D.

Organogenesis Inc., Canton, Massachusetts

Organogenesis developed and manufactures Apligraf®, a living, bi-layered skin substitute indicated for the treatment of venous leg ulcers and diabetic foot ulcers. Apligraf has been reviewed and regulated by the Food and Drug Administration's (FDA) Center for Devices and Radiological Health (CDRH) since 1987. Wound healing products have been under the jurisdiction of CDRH since the Medical Device Amendments of 1976. The current regulatory structure under CDRH has worked successfully in bringing Apligraf and similar new products to market. Organogenesis supports the current FDA jurisdictional structure for wound healing products containing living cells under CDRH and opposes any change in that structure. CDRH's long-standing history in regulating wound care products has contributed to the development of substantial knowledge and expertise in the field of wound healing. CDRH has expanded upon this experience to effectively incorporate the review and regulation of new technologies in the wound healing field. The Center has consistently demonstrated the ability to address the issues unique to wound healing.

No compelling public safety concern exists that would suggest any need for a jurisdictional shift for Apligraf and other wound healing products containing living cells. CDRH has implemented a comprehensive review of manufacturing controls and safety testing. Clinically, Apligraf has demonstrated a strong safety profile since entering the commercial market in 1998. To date over 50,000 patients have been treated with Apligraf. The incidence of Medical Device Reports in the United States regarding Apligraf has been less than 0.1%. Adverse event reporting has been consistent with the approved product labeling which showed comparability to standard care including non-interactive wound dressings in randomized, controlled clinical studies. Safety concerns were appropriately addressed by CDRH within the framework of clinical studies performed under the Investigational Device Exemption and subsequently approved product labeling. Wound care products such as Apligraf are applied to the local wound site and as expected adverse events are localized. The most commonly reported adverse events include wound infection, erythema, edema, cellulitis and inflammation. These events are typical of patients with open wounds. Systemic adverse events have not been attributed to the product and there is no evidence of absorption or metabolism of Apligraf. This supports the conclusion that Apligraf's therapeutic effect is localized.

By its structure and function Apligraf is a single entity. Apligraf possesses structural attributes grossly and histologically which lend itself to evaluation as a device. The

Organogenesis Inc.

SUMMARY STATEMENT

Combination Products Containing Live Cellular Components; Public Hearing

Docket No. 02N-0169

Michael L. Sabolinski, M.D.

Organogenesis Inc., Canton, Massachusetts

cellular components are integrated into the acellular matrix resulting in a cellular wound dressing with specified dimensions. The cells make the final structure of Apligraf possible but the resulting product is a single physical object applied to a designated wound site resulting in localized healing. In its final configuration it is not possible to separate the acellular matrix from the cells either physically or functionally. In its final form the level of contribution to the wound healing process by each component in Apligraf can not be definitively determined.

Wound healing is a complicated process involving a complex cascade of events at the wound site. Identifying a single mode of action in products intended to result in wound healing is not possible because the wound healing process is not caused by a single event. In the absence of a single mode of action, FDA should defer to the established regulatory paradigm existing under CDRH, which relies on review of manufacturing controls, safety testing and randomized, controlled clinical trials to establish the safety and efficacy of wound healing products.

CDRH has effectively regulated wound healing products containing living cells. The public health has been served by CDRH's approval to market new wound healing technologies. Patients and healthcare providers have benefited as additional treatment options have become available. Maintaining the current regulatory structure with wound healing products assigned to the jurisdiction of CDRH will assure adequate review of new technologies, continue to protect the public health, and advance the field of wound care.