

November 10, 2020

**VIA EDGAR**

Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549

Re: Organogenesis Holdings Inc.  
Registration Statement on Form S-1  
File No. 333-249531  
Request for Acceleration

Ladies and Gentlemen:

Pursuant to Rule 461 under the Securities Act of 1933, as amended, Organogenesis Holdings Inc. (the "Company") hereby requests acceleration of the effective date of its Registration Statement on Form S-1 (File No. 333-249531), as amended (the "Registration Statement"), so that it may become effective at 4:00 pm Eastern time on November 12, 2020, or as soon thereafter as practicable, or at such other time as the Company or its outside counsel, Foley Hoag LLP, requests by telephone that such Registration Statement be declared effective. By separate letter, the underwriters of the offering of securities being registered join in this request for acceleration.

The Company hereby acknowledges that:

- (i) should the Securities and Exchange Commission (the "Commission") or the staff, acting pursuant to delegated authority, declare the Registration Statement effective, it does not foreclose the Commission from taking any action with respect to the Registration Statement;
- (ii) the action of the Commission or the staff, acting pursuant to delegated authority, in declaring the Registration Statement effective, does not relieve the Company from its full responsibility for the adequacy and accuracy of the disclosure in the Registration Statement; and
- (iii) the Company may not assert staff comments and the declaration of effectiveness of the Registration Statement as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

Please feel free to direct any questions or comments concerning this request to Stacie S. Aarestad, Esq. of Foley Hoag LLP at (617) 832-1108.

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Very truly yours,

**ORGANOGENESIS HOLDINGS INC.**

By: /s/ Lori Freedman

Name: Lori Freedman

Title: Vice President and General Counsel

*[Signature Page to Organogenesis Holdings Inc. Acceleration Request]*