

October 22, 2020

Gary S. Gillheeney, Sr.
President and Chief Executive Officer
Organogenesis Holdings Inc.
85 Dan Road
Canton, MA 02021

Holdings Inc.

Statement on Form S-1
2020

Re: Organogenesis

Registration

Filed October 16,

File No. 333-249531

Dear Mr. Gillheeney:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Adams at (202) 551-6902 with any questions.

Please contact Abby

Sincerely,

Division of Corporation Finance

Office of Life Sciences

cc:
Esq.

Stacie S. Aarestad,