

June 09, 2023

Novabone Products, LLC % Linda Braddon CEO Secure BioMed Evaluations 7828 Hickory Flat Highway Suite 120 Woodstock, Georgia 30188

Re: K220498

Trade/Device Name: NovoGen Wound Matrix

Regulatory Class: Unclassified

Product Code: KGN Dated: May 9, 2023 Received: May 10, 2023

Dear Linda Braddon:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. Although this letter refers to your product as a device, please be aware that some cleared products may instead be combination products. The 510(k) Premarket Notification Database located at https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm identifies combination product submissions. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part

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801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803) for devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820) for devices or current good manufacturing practices (21 CFR 4, Subpart A) for combination products; and, if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to https://www.fda.gov/medical-device-problems.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance) and CDRH Learn (https://www.fda.gov/training-and-continuing-education/cdrh-learn). Additionally, you may contact the Division of Industry and Consumer Education (DICE) to ask a question about a specific regulatory topic. See the DICE website (https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Tek N. Digitally signed by Tek N. Lamichhane
Lamichhan -S
Date: 2023.06.09
09:54:23 -04'00'

For Julie A. Morabito, Ph.D.
Assistant Director
DHT4B: Division of Infection Control
and Plastic Surgery Devices
OHT4: Office of Surgical
and Infection Control Devices
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

DEPARTMENT OF HEALTH AND HUMAN SERVICES Food and Drug Administration

Indications for Use

Form Approved: OMB No. 0910-0120

Expiration Date: 06/30/2023 See PRA Statement below.

510(k) Number <i>(if known)</i>
K220498
Device Name
NovoGen Wound Matrix
Indications for Use (Describe)
NovoGen Wound Matrix is indicated for the management of wounds including:
Partial and full-thickness wounds
Pressure ulcers
• Venous ulcers
• Diabetic ulcers
Chronic vascular ulcers
Tunneled/undermined wounds
• Surgical wounds (donor sites/grafts, post-Moh's surgery, post-laser surgery, podiatric, wound dehiscence)
• Trauma wounds (abrasions, lacerations, partial thickness burns, and skin tears)
Draining wounds
Type of Use (Select one or both, as applicable)

This section applies only to requirements of the Paperwork Reduction Act of 1995.

CONTINUE ON A SEPARATE PAGE IF NEEDED.

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510(k) SUMMARY K220498

NovoGen Wound Matrix

Date Prepared	June 9, 2023		
•	NovaBone Products, LLC		
Sponsor	13510 NW US Highway 441		
•	Alachua, FL 32615		
	Secure BioMed Evaluations		
	Linda Braddon, Ph.D.		
	7828 Hickory Flat Highway		
510(k) Contact	Suite 120		
	Woodstock, GA 30188		
	770-837-2681		
	Regulatory@SecureBME.com		
Trade Name	NovoGen Wound Matrix		
Common Name	Collagen Wound Matrix		
C 1 C1 '6' 4'	KGN		
Code – Classification	Unclassified		
Primary Predicate	K092096 Mesynthes Endoform Dermal Template		
	K110368 NovaBone Putty - Bioactive Synthetic Bone Graft		
Reference Devices	K112428 NovaBone Dental Morsels - Bioactive Synthetic Bone Graft		
	K141207 NovaBone Bioactive Strip		
	NovoGen Wound Matrix is a an absorbable, non-pyrogenic, sterile, single		
	use device intended for use in local management of cutaneous wounds. It is		
Device Description	manufactured from bovine type I collagen and 45S5 bioactive glass. When		
Device Description	hydrated with wound exudate or sterile water, this product transforms into a		
	soft conforming layer which is naturally incorporated into the wound over		
	time.		
	NovoGen Wound Matrix is indicated for the management of wounds		
	including:		
	Partial and full-thickness wounds		
	Pressure ulcers		
	Venous ulcers		
Indications for Use	Diabetic ulcers		
Statement	Chronic vascular ulcers		
	Tunneled/undermined wounds		
	• Surgical wounds (donor sites/grafts, post-Moh's surgery, post-laser		
	surgery, podiatric, wound dehiscence)		
	• Trauma wounds (abrasions, lacerations, partial thickness burns, and		
	skin tears)		
	Draining wounds		

Comparison of Technological Characteristics

Trait	NovaBone Products, LLC NovaGen Wound Matrix (Subject Device)	Primary Predicate Mesynthes Ltd Endoform Dermal Template K092096
510(k) number	K220498	K092096
Regulation	Unclassified	Unclassified
Product	KGN	KGN
Classification		
Common Name	Collagen Wound Dressing	Collagen Wound Dressing
Indications for	NovoGen Wound Matrix is indicated	Endoform is supplied sterile and is
Use	for the management of wounds	intended for single use in the treatment
	including:	of the
	 Partial and full-thickness wounds 	following wounds:
	Pressure ulcers	 Partial and full-thickness wounds
	Venous ulcers	Pressure ulcers
	Diabetic ulcers	Venous ulcers
	Chronic vascular ulcers	Diabetic ulcers
	Tunneled/undermined wounds	Chronic vascular ulcers
	• Surgical wounds (donor sites/grafts,	Tunneled/undermined wounds
	post-Moh's surgery, post-laser	• Surgical wounds (donor sites/grafts,
	surgery, podiatric, wound	post-Moh's surgery, post-laser
	dehiscence)	surgery, podiatric, wound
	• Trauma wounds (abrasions,	dehiscence)
	lacerations, partial thickness burns,	• Trauma wounds (abrasions,
	and skin tears)	lacerations, second-degree burns,
	Draining wounds	and skin tears)
	8	Draining wounds
Composition of	Bovine Collagen	Ovine
Material	Bioactive Glass	collagen
	Citric Acid	
Structural	Bioactive Glass (Same material as	Not applicable
Reinforcement	reference device K141207)	
Material	ŕ	
Primary	Wound Dressing	Wound Dressing
Function	e e e e e e e e e e e e e e e e e e e	Č
Absorbable	Yes	Not Stated, but websites say it will
		dissolve into the wound
Size(s)	Range of sizes from 26cm ² to 130cm ² :	Range of sizes from 9cm ² to 400cm ²
	• 2" x 2" (5.1cm x 5.1cm)	
	• 2" x 3" (5.1cm x 7.6cm)	
	• 3" x 3" (7.6cm x 7.6cm)	
	• 4" x 5" (10.2cm x 12.7cm)	

Trait	NovaBone Products, LLC NovaGen Wound Matrix (Subject Device)	Primary Predicate Mesynthes Ltd Endoform Dermal Template K092096
Fluid	Yes	Not stated
Absorbency		
Moist	Maintains a moist wound environment	Not stated
Environment		
Perforated	No	Perforated and Non-Perforated
Layers	One Layer	One or Two Layers
Customizable	Yes, trim to size	Yes, trim to size
Sterilization	Gamma, 10 ⁻⁶ SAL	Ethylene Oxide, 10 ⁻⁶ SAL
Packaging	Single peel packs	Not stated
Biocompatibility	Biocompatible	Biocompatible
Single Use	Yes	Yes
Reapplication	As needed	Every 5 to 7 days as needed
Non-Pyrogenic	Yes	Not specified

Technological Characteristics

NovoGen Wound Matrix is supplied terminally sterile in a sterile barrier packaging configuration. NovoGen Wound Matrix is a scaffold and is similar to other wound matrices with respect to its design. The subject device is composed of bovine collagen with Bioglass® 45S5 added as additional structural reinforcement.

There are no significant technological differences between the subject and predicate device. The subject device uses similar materials, is of a similar size and thickness, has similar design properties, and has the same intended use as the primary and additional predicates and reference devices. The presentation of the device in single vs dual peel pack packaging configuration does not create new risks for safety or effectiveness. The subject device uses the same packaging configuration as cleared in reference device K110368 NovaBone Putty - Bioactive Synthetic Bone Graft and uses the same sterilization process as cleared in reference device K112428 NovaBone Dental Morsels - Bioactive Synthetic Bone Graft.

Non-Clinical Performance Testing Summary

Performance testing for the NovaBone NovoGen Wound Matrix includes:

- Absorption Capacity
- Compression Recovery
- Degradation Potential via Collagenase
- Hydration Time
- Tensile Strength
- Viral Inactivation

A full thickness porcine wound healing study found equivalent wound healing performance for the NovaBone NovoGen Wound Matrix when compared to the primary predicate device and untreated control sites.

The NovaBone NovoGen Wound Matrix was found to be biocompatible for its intended use when tested in compliance with ISO 10993-1. Cytotoxicity, sensitization, irritation, acute systemic toxicity, material mediated pyrogenicity, subacute systemic toxicity, implantation, genotoxicity, and endotoxin endpoints were addressed via testing while chronic toxicity and carcinogenicity were addressed via a toxicological risk assessment.

A Human Repeat Insult Patch Test (HRIPT) was performed to determine the potential of the test material to elicit dermal irritation and/or induce sensitization following repeated patch applications in human subjects. The Induction Phase of the study is designed to assess the potential of the subject device to elicit an irritation reaction, whereas the Challenge Phase of the study is designed to assess the potential of the subject device to elicit a sensitization response.

Based on the test population who completed the study, NovoGen Wound Matrix did not demonstrate a potential for eliciting dermal irritation or inducing sensitization.

Conclusions

Based on the similarities of the intended use/indications for use, technological and functional characteristic, and the results of the non-clinical performance testing, the subject device is substantially equivalent to the legally marketed predicate device.