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Standard Guide for Characterization of Type I Collagen as Starting Material for Surgical Implants and Substrates for Tissue Engineered Medical Products (TEMPs)¹

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INTRODUCTION

Collagen-based medical products are becoming more prevalent, especially in the area of soft tissue augmentation. The use of collagen in surgery dates back to the late 1800s, with the use of catgut sutures, human cadaveric skin, and fascia. More recently, collagen has been used in hemostatic sponges, dermal equivalents, injectables for soft tissue augmentation, as a matrix for cell-based products, and as a vehicle for drug delivery. It is because of the versatility of collagen in medical applications that specific characterizations should be performed as a way to compare materials.

1. Scope

1.1 This guide for characterizing collagen-containing biomaterials is intended to provide characteristics, properties, and test methods for use by producers, manufacturers, and researchers to more clearly identify the specific collagen materials used. With greater than 20 types of collagen and the different properties of each, a single document would be cumbersome. This guide will focus on the characterization of Type I collagen, which is the most abundant collagen in mammals, especially in skin and bone. Collagen isolated from these sources may contain other types of collagen, for example, Type III and Type V. This guide does not provide specific parameters for any collagen product or mix of products or the acceptability of those products for the intended use. The collagen may be from any source including, but not limited to, animal or cadaveric sources, human cell culture, or recombinant sources. The biological, immunological, or toxicological properties of the collagen may vary, depending on the source material. The properties of the collagen prepared from each of the above sources must be thoroughly investigated, as the changes in the collagen properties as a function of source materials is not thoroughly understood. This guide is intended to focus on purified Type I collagen as a starting material for surgical implants and substrates for tissue engineered medical products (TEMPs); some methods may not be applicable for

gelatin or tissue implants. This guide may serve as a template for characterization of other types of collagen.

1.2 The biological response to collagen in soft tissue has been well documented by a history of clinical use (1, 2)² and laboratory studies (3-6). Biocompatibility and appropriateness of use for a specific application(s) is the responsibility of the product manufacturer.

1.3 The values stated in SI units are to be regarded as standard. No other units of measurement are included in this standard.

1.4 **Warning**—Mercury has been designated by EPA and many state agencies as a hazardous material that can cause central nervous system, kidney, and liver damage. Mercury, or its vapor, may be hazardous to health and corrosive to materials. Caution should be taken when handling mercury and mercury-containing products. See the applicable product Material Safety Data Sheet (MSDS) for details and EPA's website (<http://www.epa.gov/mercury/faq.htm>) for additional information. Users should be aware that selling mercury or mercury-containing products, or both, in your state may be prohibited by state law.

1.5 The following precautionary caveat pertains only to the test method portion, Section 5, of this guide. *This standard does not purport to address all of the safety concerns, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate safety, health, and environmental practices and determine the applicability of regulatory limitations prior to use.*

¹ This guide is under the jurisdiction of ASTM Committee F04 on Medical and Surgical Materials and Devices and is the direct responsibility of Subcommittee F04.42 on Biomaterials and Biomolecules for TEMPs.

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² The boldface numbers in parentheses refer to the list of references at the end of this standard.

1.6 This international standard was developed in accordance with internationally recognized principles on standardization established in the *Decision on Principles for the Development of International Standards, Guides and Recommendations issued by the World Trade Organization Technical Barriers to Trade (TBT) Committee*.

2. Referenced Documents

2.1 ASTM Standards:³

- F619 Practice for Extraction of Materials Used in Medical Devices
- F720 Practice for Testing Guinea Pigs for Contact Allergens: Guinea Pig Maximization Test
- F748 Practice for Selecting Generic Biological Test Methods for Materials and Devices
- F749 Practice for Evaluating Material Extracts by Intracutaneous Injection in the Rabbit
- F756 Practice for Assessment of Hemolytic Properties of Materials
- F763 Practice for Short-Term Screening of Implant Materials
- F813 Practice for Direct Contact Cell Culture Evaluation of Materials for Medical Devices
- F895 Test Method for Agar Diffusion Cell Culture Screening for Cytotoxicity
- F981 Practice for Assessment of Compatibility of Biomaterials for Surgical Implants with Respect to Effect of Materials on Muscle and Insertion into Bone
- F1439 Guide for Performance of Lifetime Bioassay for the Tumorigenic Potential of Implant Materials
- F1903 Practice for Testing for Cellular Responses to Particles *in vitro*
- F1904 Practice for Testing the Biological Responses to Particles *in vivo*
- F2148 Practice for Evaluation of Delayed Contact Hypersensitivity Using the Murine Local Lymph Node Assay (LLNA)

2.2 ISO Standards:⁴

- ISO 10993–1 Biological Evaluation of Medical Devices—Part 1: Evaluation and Testing within a Risk Management Process
- ISO 10993–9 Framework for Identification and Quantification of Potential Degradation Products
- ISO 10993–10 Biological Evaluation of Medical Devices—Part 10: Tests for Irritation and Skin Sensitization
- ISO 10993–17 Establishment of Allowable Limits for Leachable Substances Using Health-Based Risk Assessment

- ISO 13408–1 Aseptic Processing of Health Care Products—Part 1: General Requirements
- ISO 14971 Medical Devices—Application of Risk Management to Medical Devices
- ISO 22442–1 Animal Tissues and their Derivatives Utilized in the Manufacture of Medical Devices—Part 1: Application of Risk Management
- ISO 22442–2 Animal Tissues and their Derivatives Utilized in the Manufacture of Medical Devices—Part 2: Controls on Sourcing, Collection, and Handling
- ISO 22442–3 Animal Tissues and their Derivatives Utilized in the Manufacture of Medical Devices—Part 3: Validation of the Elimination and/or Inactivation of Viruses and Transmissible Spongiform Encephalopathy (TSE) Agents

2.3 U. S. and European Pharmacopeia Documents:⁵

- European Pharmacopeia 5.0
- United States Pharmacopeia (USP), Edition XXX (30)
- USP 30/NF 19 Viral Safety Evaluation of Biotechnology Products Derived from Cell Lines of Human or Animal Origin

2.4 Code of Federal Regulations:⁶

- 9 CFR 113 Standard Requirements
- 21 CFR 312 Investigational New Drug Application
- 21 CFR Part 820 Quality System Regulation
- 21 CFR Parts 207, 807, and 1271 Human Cells, Tissues and Cellular and Tissue-Based Products, Establishment Registration and Listing
- 21 CFR Part 1271, Part C Suitability Determination for Donors of Human Cell and Tissue-based Products, Proposed Rule
- CFR 610.13(b) Rabbit Pyrogen Assay
- Current Good Tissue Practice for Manufacturers of Human Cellular and Tissue-Based Products, Inspection and Enforcement. Proposed Rule. Federal Register/Vol. 66, No. 5/January 8, 2001/Proposed Rules, pp. 1552-1559
- Guidance for Screening and Testing of Donors of Human Tissue Intended for Transplantation, Availability. Federal Register/Vol. 62, No. 145/July 29, 1997/Notices
- Guidance for Industry and for FDA Reviewers, Medical Devices Containing Materials Derived from Animal Sources (Except for *In Vitro* Diagnostic Devices), November 6, 1998, U.S. Department of Health and Human Services, Food and Drug Administration, Center for Devices and Radiological Health
- Federal Register Vol. 43, No. 141, Friday, July 21, 1978
- Federal Register, Vol. 66, No. 13, Jan 19, 2001/Rules and Regulations, p. 5447
- Federal Register, Vol. 72, No. 8, Jan. 12, 2007, pp. 1581–1619, Proposed Rule: Use of Materials Derived

³ For referenced ASTM standards, visit the ASTM website, www.astm.org, or contact ASTM Customer Service at service@astm.org. For *Annual Book of ASTM Standards* volume information, refer to the standard's Document Summary page on the ASTM website.

⁴ Available from International Organization for Standardization (ISO), ISO Central Secretariat, BIBC II, Chemin de Blandonnet 8, CP 401, 1214 Vernier, Geneva, Switzerland, <http://www.iso.org>.

⁵ Available from U.S. Pharmacopeial Convention (USP), 12601 Twinbrook Pkwy., Rockville, MD 20852-1790, <http://www.usp.org>.

⁶ Available from U.S. Government Printing Office Superintendent of Documents, 732 N. Capitol St., NW, Mail Stop: SDE, Washington, DC 20401, <http://www.access.gpo.gov>.

from Cattle in Medical Products Intended for Use in Humans and Drugs Intended for Use in Ruminants

2.5 ICH Documents:⁷

ICH M3(R2) Guidance for Industry M3 Nonclinical Safety Studies for the Conduct of Human Clinical Trials and Marketing Authorizations for Pharmaceuticals 62 FR 62922 (2009)

ICH S1A Guideline for Industry S1A The Need for Long-term Rodent Carcinogenicity Studies of Pharmaceuticals. 61 FR 8153 (1996)

ICH S1B Guidance for Industry S1B Testing for Carcinogenicity of Pharmaceuticals. 63 FR 8983 (1998)

ICH S1C Guideline for Industry S1C Dose Selection for Carcinogenicity Studies of Pharmaceuticals. 60 FR 11278 (1995)

ICH S1C(R) Guidance for Industry Addendum to Dose Selection for Carcinogenicity Studies of Pharmaceuticals: Addition of a Limit Dose and Related Notes. 62 FR 64259 (1997)

ICH S2A Guideline for Industry S2A Specific Aspects of Regulatory Genotoxicity Tests for Pharmaceuticals. 61 FR 18199 (1996)

ICH S2B Guidance for Industry S2B Genotoxicity: A Standard Battery for Genotoxicity Testing of Pharmaceuticals 62 FR 62472 (1997)

ICH S5A Guideline for Industry S5A Detection of Toxicity to Reproduction for Medicinal Products. 59 FR 48746 (1994)

ICH S5B Guidance for Industry S5B Detection of Toxicity to Reproduction for Medicinal Products: Addendum to Toxicity to Male Fertility. 61 FR 15360 (1996)

ICH Q1A(R2) Harmonized Tripartite Guideline for Stability Testing of New Drug Substances and Products (February 6, 2003)

2.6 FDA Documents:⁸

FDA Guidance for Industry, Pyrogen and Endotoxins Testing: Questions and Answers, June 2015, U.S. Department of Health and Human Services, Food and Drug Administration, Center for Drug Evaluation and Research, Center for Biologics Evaluation and Research, Center for Veterinary Medicine, Center for Devices and Radiological Health, Office of Regulatory Affairs

FDA Interim Guidance for Human and Veterinary Drug Products and Biologicals, Kinetic LAL Techniques, DHHS, July 15, 1991

U.S. Food and Drug Administration (FDA) and Committee for Proprietary Medicinal Products (CPMP), 1998 International Conference on Harmonization (ICH), Quality of Biotechnological Products: Viral Safety Evaluation of Biotechnology Products Derived from Cell Lines of Human or Animal Origin, Consensus Guideline ICH Viral Safety Document: Step 5

U.S. Food and Drug Administration (FDA) Center for Biologics Evaluation and Research (CBER), 1993 Points to Consider in the Characterization of Cell Lines Used to Produce Biologicals

U.S. Food and Drug Administration (FDA) Center for Biologics Evaluation and Research (CBER), 1997 Points to Consider in the Manufacture and Testing of Monoclonal Antibody Products for Human Use, 94D-0259

2.7 AAMI Documents:⁹

AAMI TIR 19:1998 Guidance for ANSI/AAMI/ISO 10993-7:1995, Biological Evaluation of Medical Devices—Part 7: Ethylene Oxide Sterilization Residuals

ANSI/AAMI/ISO 11737-1:2018 Sterilization of Healthcare Products—Microbiological Methods—Part 1: Determination of a Population of Microorganisms on Products

ANSI/AAMI/ISO 11737-2:2009 Sterilization of Medical Devices—Microbiological Methods—Part 2: Tests of Sterility Performed in the Definition, Validation and Maintenance of a Sterilization Process

ANSI/AAMI/ISO 14160:2011/(R) 2016 Sterilization of Health Care Products—Liquid Chemical Sterilizing Agents for Single-Use Medical Devices Utilizing Animal Tissues and Their Derivatives—Requirements for Characterization, Development, Validation and Routine Control of a Sterilization Process for Medical Devices

ANSI/AAMI ST67:2011/(R) 2017 Sterilization of Health Care Products—Requirements and Guidance for Selecting a Sterility Assurance Level (SAL) for Products Labeled “Sterile”

2.8 Other References:

Draft Guidance for Preclinical and Clinical Investigations of Urethral Bulking Agents Used in the Treatment of Urinary Incontinence, November 29, 1995. (ODE/DRARD/ULDB), Document No. 850¹⁰

Council Directive 93/42/EEC, with Respect to Medical Devices Using Tissues of Animal Origin¹¹

Commission Directive 2003/32/EC, with Respect to Medical Devices Manufactured Using Tissues of Animal Origin¹¹

EMEA/410/01-rev.2, Committee for Proprietary Medical Products, Note for Guidance on Minimizing the Risk of Transmitting Animal Spongiform Encephalopathy Agents via Human and Veterinary Medical Products¹²

The European Agency for the Evaluation of Medicinal Products (EMEA), Committee for Proprietary Medicinal Products (CPMP) Guidance Document for Decision Trees for the Selection of Sterilisation Methods (CPMP/QWP/054/98 corr 2000) and Annex to Note for Guidance on

⁹ Available from Association for the Advancement of Medical Instrumentation (AAMI), 4301 N. Fairfax Dr., Suite 301, Arlington, VA 22203-1633, <http://www.aami.org>.

¹⁰ Available from U.S. Food and Drug Administration (FDA), 10903 New Hampshire Ave., Silver Spring, MD 20993, <http://www.fda.gov>.

¹¹ Available from Office for Official Publications of the European Communities—European Law, 2, rue Mercier, L-2985, Luxembourg, <http://eur-lex.europa.eu/en/index.htm>.

¹² Available from European Medicines Agency (EMA), 7 Westferry Circus, Canary Wharf, London E14 4HB, U.K., <http://www.eudora.org/emea.html>, and <http://www.emea.europa.eu/pdfs/human/bwp/TSE%20NFG%20410-rev2.pdf>.

⁷ Available from International Conference on Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use (ICH), ICH Secretariat, 9, chemin des Mines, P.O. Box 195, 1211 Geneva 20, Switzerland, <http://www.ich.org>.

⁸ Available from U.S. Food and Drug Administration (FDA), 10903 New Hampshire Ave., Silver Spring, MD 20993, <http://www.fda.gov>.

3. Terminology

3.1 Definitions:

3.1.1 *adventitious agent, n*—an unintentionally introduced microbiological or other infectious contaminant.

3.1.1.1 *Discussion*—In the production of TEMPs, these agents may be unintentionally introduced into the process stream or the final product, or both.

3.1.2 *biocompatibility, n*—a material may be considered biocompatible if the material performs with an appropriate host response in a specific application (7).

3.1.3 *collagen, n*—a family of at least 20 genetically different secreted proteins that serve a predominantly structural function and possess a unique triple helical structure configuration of three polypeptide units known as alpha chains.

3.1.4 *degradation, n*—change in chemical, physical, or molecular structure or appearance (that is, gross morphology) of a material.

3.1.5 *endotoxin, n*—pyrogenic high molar mass lipopolysaccharide (LPS) complex associated with the cell wall of gram-negative bacteria.

3.1.5.1 *Discussion*—Though endotoxins are pyrogens, not all pyrogens are endotoxins. Endotoxins are specifically detected through a *Limulus* amoebocyte lysate (LAL) test.

3.1.6 *medical product, n*—any diagnostic or therapeutic treatment that may be regulated as a device, biologic, drug, or combination product.

3.1.7 *microorganism, n*—bacteria, fungi, yeast, mold, viruses, and other infectious agents.

3.1.7.1 *Discussion*—However, it should be noted that not all microorganisms are infectious or pathogenic.

3.1.8 *solubility, n*—a measure of the extent to which the material can be dissolved.

3.1.8.1 *Discussion*—Any colloidal system without obvious phase separation can be considered soluble. In the context of collagen, solubility refers to the dissociation of the fibrillar aggregates of collagen molecules into a solution. Native Type I collagen, which is soluble in dilute acids, but not soluble at physiological conditions, is termed “insoluble” or “acid soluble,” while simple aggregates of non-fibrillar collagen soluble in neutral salt solutions are termed “neutral salt soluble.” Post translational surface charge modifications may alter the solubility of collagen in neutral pH condition.

3.1.9 *sterilization, n*—the destruction or removal of all microorganisms in or about an object (for example, by chemical agents, electron beam, gamma irradiation, or filtration).

3.1.9.1 *Discussion*—If the medical product collagen permits, terminal sterilization is preferential to aseptic processing.

3.1.10 *suspension, n*—the dispersion of a solid through a liquid with a particle size large enough to be detected by purely optical means.

4. Significance and Use

4.1 The objective of this guide is to provide guidance in the characterization of Type I collagen as a starting material for surgical implants and substrates for tissue engineered medical products (TEMps). This guide contains a listing of physical and chemical parameters that are directly related to the function of collagen. This guide can be used as an aid in the selection and characterization of the appropriate collagen starting material for the specific use. Not all tests or parameters are applicable to all uses of collagen.

4.2 The collagen covered by this guide may be used in a broad range of applications, forms, or medical products, for example (but not limited to) medical devices, tissue engineered medical products (TEMps) or cell, drug, or DNA delivery devices for implantation. The use of collagen in a practical application should be based, among other factors, on biocompatibility and physical test data. Recommendations in this guide should not be interpreted as a guarantee of clinical success in any tissue engineered medical product or drug delivery application.

4.3 The following general areas should be considered when determining if the collagen supplied satisfies requirements for use in TEMps. These are source of collagen, chemical and physical characterization and testing, and impurities profile.

4.4 The following documents or other appropriate guidances from appropriate regulatory bodies relating to the production, regulation, and regulatory approval of TEMps products should be considered when determining if the collagen supplied satisfies requirements for use in TEMps:

FDA CFR:

- 21 CFR 3: Product Jurisdiction:
<http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcr/CFRSearch.cfm?CFRPart=3>
- 21 CFR 58: Good Laboratory Practice for Nonclinical Laboratory Studies:
<http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcr/CFRSearch.cfm?CFRPart=58>

FDA/CDRH CFR and Guidances:

- 21 CFR Part 803: Medical Device Reporting:
<http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcr/CFRSearch.cfm?CFRPart=803>
- 21 CFR 812: Investigational Device Exemptions:
<http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcr/CFRSearch.cfm?CFRPart=812>
- 21 CFR 814: Premarket Approval of Medical Devices :
<http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcr/CFRSearch.cfm?CFRPart=814>
- 21 CFR 820: Quality System Regulation:
<http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcr/CFRSearch.cfm?CFRPart=820>
- Design Control Guidance for Medical Device Manufacturers:
<http://www.fda.gov/cdrh/comp/designgd.pdf>
- Preproduction Quality Assurance Planning Recommendations for Medical Device Manufacturers (FDA 90-4236):
<http://www.fda.gov/cdrh/manual/appende.html>
- The Review and Inspection of Premarket Approval Applications under the Bioresearch Monitoring Program—Draft Guidance for Industry and FDA Staff:
<http://www.fda.gov/cdrh/comp/guidance/1602.pdf>

FDA/CDRH Search Engines:

¹³ Available from European Medicines Agency (EMA), 7 Westferry Circus, Canary Wharf, London E14 4HB, U.K., <http://www.eudora.org/emea.html>, and <http://www.emea.europa.eu/pdfs/human/qwp/005498en.pdf>.

CDRH Guidance Search Engine:
<http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfggp/search.cfm>
 CDRH Premarket Approval (PMA) Search Engine:
<http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfPMA/pma.cfm>
 CDRH 510(k) Search Engine:
<http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfPMN/pmn.cfm>
 CDRH Recognized STANDARDS Search Engine :
<http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfStandards/search.cfm>

FDA/CBER CFR and Guidances:

21 CFR 312: Investigational New Drug Application :
<http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?CFRPart=312>
 21 CFR 314: Applications for FDA Approval to Market a New Drug:
<http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?CFRPart=314>
 21 CFR 610: General Biological Products Standards:
<http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?CFRPart=610>
 21 CFR 1271: Human Cells, Tissues and Cellular and Tissue-Based Products:
<http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?CFRPart=1271>
 Cellular & Gene Therapy Guidances and Other Publications:
<http://www.fda.gov/cber/genetherapy/gtpubs.htm>
 Human Tissue Guidances and Other Publications:
<http://www.fda.gov/cber/tissue/docs.htm>
 CBER Product Approval Information:
<http://www.fda.gov/cber/efoi/approve.htm>
 21 CFR 600, 601 BLA Regulations:
http://www.access.gpo.gov/nara/cfr/waisidx_07/21cfrv7_07.html
 21 CFR 210, 211 GMP Regulations:
http://www.access.gpo.gov/nara/cfr/waisidx_07/21cfr210_07.html

5. Chemical and Physical Characterizations

5.1 General Comments on Chemical and Physical Characterization of Collagen—These methods are suggested assays; however, other validated assay methods may be used. Selection of assay systems will vary, depending on the configuration of the collagen (that is, soluble or insoluble). The user should ensure that the method selected is reliable and commonly accepted in protein chemistry. A review of collagen materials may be found in Li, 2000 (8), while a review of the collagen family of proteins may be found in Refs (9-14). When selecting an appropriate test method, the user should note that impurities in highly purified collagen are low or lower than 1 to 2 %, so sensitive test methods need to be utilized. For soluble collagen, the following represents a non-inclusive list of assay systems available: Sodium Dodecyl Sulfate Polyacrylamide Gel Electrophoresis (SDS-PAGE); peptide mapping; and physicochemical analysis. A similar list for insoluble collagen may include, but not be limited to, assay methods for hexosamine (that is, detection of glycoproteins), lipid, total sugar, desmosine (that is, elastin), and amino acid composition (that is, collagen composition profile; non-collagenous amino acids). Additionally, methods such as transmission electron microscopy may be helpful in characterizing the collagen fibers or collagen superstructure.

5.2 The concentration of collagen should be expressed in mass/volume or mass/mass. Colorimetric assays or amino acid analysis for hydroxyproline are commonly used methods to measure collagen content.

5.3 Amino acid analysis will provide information on the composition of the amino acids of collagen (that is, the amino

acids must be within the range of published data for highly purified collagen preparations, generally in the acid soluble form). Amino acid analysis is routinely performed on hydrolyzed collagens by reverse phase High Performance Liquid Chromatography (HPLC). This method can be used to quantify hydroxyproline, tyrosine, tryptophan, and cysteine. There are other methods available for amino acid analysis.

5.4 Purity of soluble collagen can be analyzed by SDS-PAGE, either on the collagen directly or after digestion of the collagen with purified bacterial collagenase to detect any remaining proteins.

5.5 Elastin Assay—Elastin can be a component of the impurities in an insoluble collagen preparation. One method to assay for elastin, although other methods are available, involves the detection of desmosine (15). These impurities can be detected by Western blots, enzyme-linked immunosorbent assays (ELISAs), and other types of assays.

5.6 Peptide mapping is one possible method to identify Type I collagen. The most commonly used peptide mapping method utilizes Cyanogen Bromide (CNBr) digestion. The digest can be analyzed by SDS-PAGE or HPLC.

5.7 Impurities Profile—The term impurity relates to the presence of extraneous substances and materials in the collagen. These impurities can be detected by Western blots, ELISAs, gas chromatography/mass spectrometry (GC-MS), and other types of assays. If there is a concern for the presence of processing aids or other impurities associated with the collagen, they should be addressed with the supplier. The major impurities of concern include, but are not limited to the following: endotoxins, glycosaminoglycans, elastin, lipids, improperly aligned collagen molecules, host cell contaminants, cell culture contaminants, heavy metals, bioburden, viruses, transmissible spongiform encephalopathy (TSE) agents, crosslinking and enzymatic agents, and components used in extraction or solubilization (for example, acids, surfactants, solvents, and so forth). Type III collagen may also be associated with Type I collagen. While its presence may have no adverse effect on product quality, levels should be evaluated and controlled for lot-to-lot consistency. The inclusion of urea can be used to resolve Type I and Type II collagen alpha 1 chains (16). Assessment of collagens other than Type I and III is discussed in 5.19. At a minimum, any protein impurity of greater than 1 % in the final collagen preparation should be identified and quantified.

5.8 Crosslinking Reactions with Collagen—Collagen is a very stable protein due to its triple-helical structure, imparting resistance to most proteolytic enzymes. It is still sensitive to collagenase, however. The stability can be enhanced by crosslinking the molecule by physical or chemical means. Both inter- and intrachain crosslinking can occur due to the propensity of collagen fibers to naturally crosslink. Crosslinking agents and methods include aldehydes, carbodiimides, epoxides, diisocyanates, non-enzymatic glycosylation, dehydrothermal treatment (DHT), radiation (for example, gamma, electron beam), and ultraviolet light. For chemical crosslinking, excess crosslinker should be removed and quantitated before or at the final product stage. A crosslinker may be

cytotoxic or mutagenic, or both, and any component in the final product needs to be quantitated. There are several methods available, including liquid chromatography/mass spectrophotometry (LC/MS), GC/MS, or other assays. Any crosslinker used that has the potential of reacting with DNA should be considered a mutagen. A mutagenic assay should at least be performed on the final product in that case. A cytotoxicity assessment will also provide a measure of acceptable crosslinker levels. Physical crosslinking may result in unwanted changes to the structure of the collagen molecule and should be assessed with qualification assays appropriate to the clinical indication under consideration. Direct measurement of collagen crosslinking can be performed by looking at the altered amino acid composition and using methods appropriate for the crosslinker. One method, for example (other methods exist), to measure degree of crosslinking when lysine residues are involved is to detect free lysines and hydroxylysines by labeling the ϵ -amino acid groups with 2,4,6 trinitrobenzenesulfonic acid (TNBS), where the TNBS-labeled amino acids absorb at 345 nm with a molar absorptivity of 1.46×10^4 L/mole \times cm. Amino acid composition can also be examined by analysis of sodium borohydride-treated collagen. The thermal denaturation characteristics can also be measured by Differential Scanning Calorimetry (DSC) (17). The thermal denaturation characteristics can sometimes be correlated with the crosslink density. The % water uptake (% swell), using the equation $(W_w - W_d)/W_w$, where W_d = dry weight and W_w = wet weight, is also an indirect measure of collagen crosslinking. The tensile strength can be altered by crosslinking. Measurements using a universal testing machine (UTM) or a rheometer will note a change in properties after crosslinking. Collagen crosslinking imparts a resistance to the proteolytic enzyme collagenase. Collagenase is the one enzyme that will digest triple-stranded collagen. When collagen is crosslinked, it is more resistant to breakdown and extensive crosslinking will afford the greatest resistance to collagenase.

5.9 Endotoxin Content—Endotoxin contamination is difficult to prevent because it is ubiquitous in nature, stable, and small enough to pass through sterilizing filters (0.22 μ m). Endotoxin tests for collagen include the gel clot, endpoint assay, and the kinetic assay (Food and Drug Administration Guidance for Industry, Pyrogen and Endotoxins Testing: Questions and Answers). The gel clot test is the simplest and easiest of the Limulus amoebocyte lysate (LAL) test methods, although much less sensitive than the kinetic assay. The quantitative kinetic assay, which measures the amount of time required to reach a predetermined optical density, is the most sensitive. Each new lot of reagents should meet acceptance criteria established by appropriate qualification or validation studies (for investigational or licensed/cleared products, respectively). The endotoxin level in collagen will ultimately be critical to its use in biomedical applications where there are regulatory limits to the amount of endotoxin that can be implanted into humans. Relevant FDA guidance for allowable levels and information regarding validation of endotoxin assays should be consulted if human trials are contemplated (Interim Guidance for Human and Veterinary Drug Products and Biologicals). The user is also directed to CFR 610.13(b) and Food and Drug Administration

Guidance for Industry, Pyrogen and Endotoxins Testing: Questions and Answers for information pertaining to the rabbit pyrogen assay.

5.10 Heavy Metal Content by the USP Method—This test is provided to demonstrate that the content of heavy metal impurities does not exceed a limit in the individual product specification. This method is based on <231> Heavy Metals, 1st and 6th Supplement USP-NF. Substances that typically respond to this test are lead, mercury, bismuth, arsenic, antimony, tin, cadmium, silver, copper, and molybdenum. Under the specified test conditions, the limit is determined by a concomitant visual comparison of metals that are colored by sulfide ion with a control prepared from a Standard Lead Solution. Additional heavy metal contaminants may be present due to processing. If necessary, the user may detect these contaminants by various methods that may include, but are not limited to, spectrographic, chromatographic, and flame atomic absorption techniques.

5.11 Microbiological Safety—Bacteria, viruses, and fungi are also contaminants that can arise in a biological sample. The user will validate sterilization and characterize its effect on the product. The presence of bacteria may also contribute to the presence of endotoxins. The following Microbiological Tests in USP 30 are of particular relevance: Microbial Limit Tests <61>, Sterility Tests <71>, Sterilization and sterility assurance of compendial articles <12211>, the Biological Tests and Assays: Bacterial Endotoxins Tests <85>, and viral validation studies <1050>. The user should also consider other relevant standards, such as, but not limited to, Association for the Advancement of Medical Instrumentation (AAMI) standards and international standards, of which the following are examples: ANSI/AAMI/ISO 11737-1:2018; ANSI/AAMI/ISO 11737-2:2009; and ISO 13408-1. The collagen is first dissolved in a sterile, aqueous solution, then filtered using sterile techniques through a 0.45 μ m membrane filter. The filters are subsequently incubated on Tryptic Soy Agar to determine the presence of bacteria, and on Sabouraud Dextrose Agar to determine the presence of yeast and mold. If collagen products are intended to serve as a barrier to microorganisms, this function will need to be validated with specific experiments.

5.12 Carbohydrate analysis of collagens can be carried out by classical gas-liquid chromatographic methods or spectrophotometric methods. Novel sources of collagen may result in a different glycosylation pattern or sugars that differ from human collagen, or both. A potential risk of autoimmune disease may be present. If a novel source of collagen is used and the carbohydrate pattern is unknown, a risk assessment should be performed. This should include an analysis of the sugars present on the collagen. If necessary, the glycosylation properties of the collagen should be examined and an assessment of the autoimmunity potential performed.

5.13 Trypsin susceptibility will detect that portion of collagen that has been denatured during purification steps such as acid and base treatment, solvent treatment, and so forth. Trypsin will digest that portion of the collagen and can be measured by assaying the hydroxyproline content of the supernatant. Triple helical collagen is resistant to digestion by

most proteases. Susceptibility to trypsin or other appropriate proteases is determined by exposing the collagen to the enzyme and assaying the digest for degradation. There are several methods for this test.

5.14 *Differential Scanning Calorimetry (DSC)* determines dissociation temperature of collagens in fibrils, as well as detecting microfibrils and denatured collagen at lower melting temperatures. (See also 5.8, crosslinking reactions with collagen).

5.15 *Viscosity* is more applicable to gels or suspensions but may be useful with collagen configured in forms such as, but not limited to, pastes or films (18). Viscosity of collagen-based materials depends on a number of factors which may include, but are not limited to, the following: solution or dispersion/suspension, concentration, temperature, operating condition, and so forth. It is not feasible to determine the viscosity of films. This is a routine test performed with a viscometer (not a u-tube). The user must clearly state the conditions of the test.

5.16 *Transmission electron microscopy* may be used to show the quality of collagen fibers. Unraveling or changes in banding will be obvious.

5.17 *DNA sequence data on recombinant or transgenic source cells:* Verify sequence data for expression gene, that is, COL1A1 or COL1A2.

5.18 *Characterization Methods for Type I Collagen (Table 1)*—The collagen material shall have specifications for an extensive set of chemical and physical properties such as, but not limited to, those listed in Table 1. The table represents methods which may or may not be appropriate for characterizing a particular collagen sample. Not all the methods listed may be required to characterize the sample, and the specificity and sensitivity vary among the methods listed. The user should be familiar with the limitations of the appropriate test methods.

5.19 *Analysis for Type II, IV, and Other Collagens*—Tissues commonly used to isolate Type I collagen typically contain some Type III collagen which coexists in many tissues. Type II collagen is found primarily in cartilage, while Type IV collagen is found in basement membranes and has been associated with Goodpasture's Syndrome (Wieslander, J., et al, (19)). The purity of collagen is important in determining the potential for safety problems and providing criteria for the consistency of the manufacturing process. For example, skin collagen is composed of approximately 90 % Type I, 8–10 % Type III, and the remainder is made up of trace amounts of the less abundant collagens, primarily Type IV, V, and VI (Holbrook and Smith, (20)). As all collagens contain triple helical domains, the properties of different collagen types can be very similar. Detection by Western Blot analysis, therefore, requires the use of antibodies that recognize epitopes in the more diverse non-helical regions. Antibodies are available for Types I to VI collagens, and possibly others, for use in Western Blot or ELISA analyses following SDS gel electrophoresis. Validation of antibody specificity, as well as the test procedure, using suitable standards, should be conducted prior to analysis. A risk assessment should be performed on the potential for other collagens in the product. If the presence of other collagens is

TABLE 1 Characterization Methods for Type I Collagen

Characterization Method	Applicable to
Chemical	
Appearance	Soluble or Insoluble
Concentration	Soluble or Insoluble
Purity	Soluble or Insoluble
Amino acid analysis	Soluble or Insoluble
Peptide mapping	Soluble or Insoluble
Impurities profile, including Heavy Metal Analysis	Soluble or Insoluble
Carbohydrate analysis	Soluble or Insoluble
Trypsin resistance	Soluble or Insoluble, Mainly Insoluble
Collagenase resistance	Soluble or Insoluble, Mainly Insoluble
pH of implantable	Soluble or Insoluble
Additives (cross-linkers, lubricants, drugs, sterilents)	Soluble or Insoluble
Physical	
Shrink Temperature (DSC)	Insoluble
Viscosity	Mainly soluble
TEM	Insoluble
SDS-PAGE	Soluble or Insoluble
Moisture Content, dependent on storage environment	Insoluble
Electron Micrograph (native banded 640 Å structure for fibrils)	Insoluble
Biochemical	
Endotoxin level	Soluble or Insoluble
Bioburden	Soluble or Insoluble
% Type I collagen/Total Protein	Soluble or Insoluble
% Other Types Collagen and List of which Types present	Soluble or Insoluble
Total DNA (ppm or %)	Soluble or Insoluble
Total Lipid	Soluble or Insoluble
% native collagen (by trypsin resistance, circular Dichroism)	Soluble or Insoluble

Abbreviations in Table:

DSC = Differential Scanning Calorimetry

TEM = Transmission Electron Microscopy

SDS-PAGE = Sodium Dodecyl Sulfate Polyacrylamide Gel Electrophoresis

likely, an assessment should be completed for collagens that have the potential to generate adverse reactions. The extent of analysis required will depend upon the risk of other collagen types being present as impurities in a particular collagen product.

6. Product Development Considerations

6.1 *Storage Conditions/Shelf Life Stability of Collagen*—For collagen, the most relevant stability-indicating parameters are those related to the functionality of the polymer. Depending upon what function the collagen will have in the final formulation, parameters such as viscosity (apparent and intrinsic) and biological activity, along with other parameters deemed relevant, may also be considered. Storage conditions are important, especially for collagen solutions. International Conference on Harmonization (ICH) guidance documents should be consulted for information on stability testing of pharmaceuticals (that is, ICH Q1A).

6.2 *Sterilization Method, if Applicable, and Effects of Sterilization on the Product*—The user should verify that the sterilization method does not adversely affect the collagen end