



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

January 22, 2013

Via Facsimile

Mr. Kam Shah  
Chief Executive Officer  
Bontan Corporation  
47 Avenue Road, Suite 200  
Toronto, Ontario  
Canada M5R 2G3

**Re: Bontan Corporation**  
**Form 20-F for Fiscal Year Ended March 31, 2012**  
**Filed July 25, 2012**  
**File No. 0-30314**

Dear Mr. Shah

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Ethan Horowitz

Ethan Horowitz  
Branch Chief