March 14, 2022

Allan Shaw Chief Financial Officer Portage Biotech Inc. 6 Adelaide Street East, Suite 300 Toronto, Ontario, Canada M5C1H6

Re: Portage Biotech

Form 20-F for the

Fiscal Year ended March 31, 2021

Filed July 29, 2021 Filed March 4, 2022 File No. 001-40086

Dear Mr. Shaw:

Inc.

We have completed our review of your filings. 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.

Sincerely,

Division of Corporation Finance

Office of Energy & Transportation