

November 3, 2023

Ian Walters, MD, MBA
Chief Executive Officer
Portage Biotech Inc.
Clarence Thomas Building, P.O. Box 4649
Road Town, Tortola
British Virgin Islands, VG1110

Inc.
Statement on Form F-1
2023

Re: Portage Biotech
Registration
Filed October 31,
File No. 333-275229

Dear Ian Walters:

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.

Hagius at 202-551-7967 with any questions.

Please contact Dillon

Sincerely,

Division of Corporation Finance

Office of Life Sciences

cc:

Steve Abrams