

December 29, 2006

Mr. William M. Wells
Chief Financial Officer
Bunge Limited
50 Main Street
White Plains, New York 10606
USA

**Re: Bunge Limited
Form 10-K for Fiscal Year Ended December 31, 2005
Filed March 15, 2006
Form 10-Q for Fiscal Quarters Ended June 30, 2006 and September
30, 2006
Filed August 9, 2006 and November 9, 2006
Response Letter Dated December 6, 2006
File No. 001-16625**

Dear Mr. William M. Wells:

We have reviewed your filings and have the following comments. We have limited our review of your filing to those issues we have addressed in our comments. Where indicated, we think you should revise your document in response to these comments. If you disagree, we will consider your explanation as to why our comment is inapplicable or a revision is unnecessary. Please be as detailed as necessary in your explanation. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure. After reviewing this information, we may raise additional comments.

Form 10-K for the Fiscal Year Ended December 31, 2005

Financial Statements

Note 5 Other Current Assets, page F-18

1. We note your response to our prior comment number 10. Please monitor your requirement to provide separate disclosure on the fact of your Income Statement in accordance with the guidance Rule 5-03(b) of Regulation S-X. Otherwise, please provide separate quantitative disclosure in either your MD&A or the notes to the

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financial statements to facilitate investor understanding of the amounts associated with interest income that are reflected as a component of your revenues.

Closing Comments

As appropriate, please amend your filing and respond to these comments within 10 business days or tell us when you will provide us with a response. You may wish to provide us with marked copies of the amendment to expedite our review. Please furnish a cover letter with your amendment that keys your responses to our comments and provides any requested information. Detailed cover letters greatly facilitate our review. Please understand that we may have additional comments after reviewing your amendment and responses to our comments.

You may contact Kevin Stertz at (202) 551-3723 if you have questions regarding comments on the financial statements. Please contact me at (202) 551-3683 with any other questions.

Sincerely,

Jill S. Davis
Branch Chief