



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

DIVISION OF  
CORPORATION FINANCE

July 8, 2021

Angeliki Frangou  
Chief Executive Officer  
Navios Maritime Holdings Inc.  
Strathvale House, 90 N Church Street  
P.O. Box 309, Grand Cayman  
KY1-1104 Cayman Islands

**Re: Navios Maritime Holdings Inc.**  
**Registration Statement on Form F-1**  
**Filed July 1, 2021**  
**File No. 333-257606**

Dear Ms. Frangou:

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.

Please contact Liz Packebusch at (202) 551-8749 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Energy & Transportation

cc: Mark Hayek