



DIVISION OF
CORPORATION FINANCE

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

September 22, 2020

Kenneth Carter, Ph.D.
Executive Chairman
Seneca Biopharma, Inc.
20271 Goldenrod Lane, 2nd Floor
Germantown, MD 20876

Re: Seneca Biopharma, Inc.
Registration Statement on Form S-3
Filed September 16, 2020
File No. 333-248848

Dear Dr. Carter:

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 Ada D. Sarmento at 202-551-3798 with any questions.

Sincerely,

Division of Corporation Finance
Office of Life Sciences

cc: Raul Silvestre, Esq.