

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

DIVISION OF CORPORATION FINANCE

January 22, 2024

Weilai Zhang Chief Executive Officer Antelope Enterprise Holdings Ltd Room 1802, Block D, Zhonghai International Center Hi-Tech Zone, Chengdu Sichuan Province, PRC

> Re: Antelope Enterprise Holdings Ltd Form 20-F for the Fiscal Year Ended December 31, 2022 Response Dated September 26, 2023 File No. 001-34944

Dear Weilai Zhang:

We have reviewed your September 26, 2023 response to our comment letter and have the following comment.

Please respond to this letter within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe a comment applies to your facts and circumstances, please tell us why in your response.

After reviewing your response to this letter, we may have additional comments. Unless we note otherwise, any references to prior comments are to comments in our September 12, 2023 letter.

Form 20-F for the Fiscal Year Ended December 31, 2022

Item 16I. Disclosure Regarding Foreign Jursidictions that Prevent Inspections, page 82

1. In your response to comment 1 in our letter dated July 20, 2023, you commited to amend your Form 20-F to provide the submission required by Item 16I(a) and the disclosures required by Item 16I(b). Please file your amendment promptly or tell us why you are unable to file it promptly. Please consider prior comments 2 and 4 when drafting your amendment.

Please contact Jennifer Thompson at 202-551-3737 or Andrew Mew at 202-551-3377 with any questions.

Weilai Zhang Antelope Enterprise Holdings Ltd January 22, 2024 Page 2

Sincerely,

Division of Corporation Finance Disclosure Review Program

cc: Joan Wu