

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

DIVISION OF CORPORATION FINANCE

December 18, 2020

Hugh Baker Chief Financial Officer Scorpio Bulkers Inc. 9, Boulevard Charles III MC 98000 Monaco

> Re: Scorpio Bulkers Inc. Registration Statement on Form F-3 Filed December 11, 2020 File No. 333-251301

Dear Mr. Baker:

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 Irene Barberena-Meissner, Staff Attorney, at 202-551-6548 with any questions.

Sincerely,

Division of Corporation Finance Office of Energy & Transportation

cc: Edward Horton, Esq.