

Mail Stop 3561

October 20, 2005

Mr. Michael J. Smith
President, Chief Executive Officer and Secretary
MFC Bancorp Ltd.
Suite 803, 8th Floor
Dina House
Ruttonjee Centre
11 Duddell Street
Central Hong Kong, SAR, China

Re: MFC Bancorp Ltd.
Form 20-F for the Fiscal Year Ended December 31, 2004
Filed April 6, 2005
File No. 1-04192

Dear Mr. Smith:

We have completed our review of your Form 20-F and related filings and have no further comments at this time.

Sincerely,

Martin James
Senior Assistant Chief Accountant