



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

DIVISION OF  
CORPORATION FINANCE

August 27, 2024

Ilan Sobel  
Chief Executive Officer  
BioHarvest Sciences Inc.  
1140-625 Howe Street  
Vancouver, BC V6C 2T6, Canada

**Re: BioHarvest Sciences Inc.  
Amendment No. 3 to Registration Statement on Form 20-F  
Exhibit Nos. 4.3, 4.4, 4.5, 4.6, 4.7 and 4.8  
Filed August 22, 2024  
File No. 000-56663**

Dear Ilan Sobel:

We have concluded our assessment of your redacted exhibits for compliance with applicable form requirements and will process your supplemental response and related materials in accordance with your request.

Sincerely,

Division of Corporation Finance  
Office of Life Sciences

cc: Steve O'Neill, Esq.