



DIVISION OF  
CORPORATION FINANCE

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

February 8, 2021

Peter (Peizhi) Luo  
Chief Executive Officer  
Adagene Inc.  
4F, Building C14, No. 218,  
Xinghu Street, Suzhou Industrial Park  
Suzhou, Jiangsu Province, 215123  
People's Republic of China

**Re: Adagene Inc.**  
**Registration Statement on Form F-1**  
**Exhibit Nos. 10.7, 10.8, 10.9, 10.10, 10.11, 10.12 and 10.14**  
**Filed February 5, 2021**  
**File No. 333-252210**

Dear Dr. Luo:

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

cc: Li Hi, Esq.