



DIVISION OF  
CORPORATION FINANCE

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

July 15, 2020

A. Robert Doyle  
Chief Financial Officer  
Pan American Silver Corporation  
1500-625 Howe Street  
Vancouver, British Columbia  
V6C 2T6

**Re: Pan American Silver Corp.**  
**Form 40-F for the Year Ended December 31, 2019**  
**Filed March 12, 2020**  
**File No. 000-13727**

Dear Mr. Doyle:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance  
Office of Energy & Transportation