



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

DIVISION OF
CORPORATION FINANCE

Mail Stop 4628

December 30, 2015

Via E-mail

Paul Rivett
President
Fairfax Financial Holdings Limited
95 Wellington Street West
Suite 800
Toronto, Ontario Canada
M5J 2N7

Re: Fairfax Financial Holdings Limited
40-F for Fiscal Year Ended December 31, 2014
Filed March 6, 2015
File No. 1-31556

Dear Mr. Rivett:

We refer you to our comment letter dated December 7, 2015, regarding business contacts with Sudan and Syria. We have completed our review of this subject matter. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Cecilia Blye

Cecilia Blye, Chief
Office of Global Security Risk

cc: Suzanne Hayes
Assistant Director
Division of Corporation Finance

Derek Bulas
General Counsel
Fairfax Financial Holdings Limited