

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

December 10, 2024

Ho Shian Ching Chief Financial Officer ESGL Holdings Limited 101 Tuas South Avenue 2 Singapore 637226

> Re: ESGL Holdings Limited Registration Statement on Form F-1 Filed November 29, 2024 File No. 333-283527

Dear Ho Shian Ching:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Claudia Rios at 202-551-8770 with any questions.

Sincerely,

Division of Corporation Finance Office of Energy & Transportation

cc: David Levine, Esq.