

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

DIVISION OF CORPORATION FINANCE

March 10, 2025

Todd D. Macko Chief Financial Officer Impact BioMedical, Inc. 275 Wiregrass Pkwy West Henrietta, NY 14586

> Re: Impact BioMedical, Inc. Form 10-K for the Fiscal Year Ended December 31, 2023 Filed February 20, 2024 File No. 001-42212

Dear Todd D. Macko:

We have completed our review of your filings. 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 Life Sciences