

September 22, 2020

Kim Stratton  
Chief Executive Officer  
Orphazyme A/S  
Ole Maaltesvej 3, DK-2200  
Copenhagen N  
Denmark

Re: Orphazyme A/S  
Amendment No. 1 to  
Filed September 21,  
File No. 333-248607

Registration Statement on Form F-1  
2020

Dear Ms. Stratton:

We have reviewed your amended registration statement and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter by amending your registration statement and providing the requested information. If you do not believe our comments apply to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing any amendment to your registration statement and the information you provide in response to these comments, we may have additional comments.

Amendment No. 1 to Form F-1 filed September 21, 2020

Prospectus Summary  
Overview, page 1

1. We note your disclosure on page 22 that the U.S. Food and Drug Administration (FDA) has identified to you potential review issues that you will need to address before obtaining FDA approval of arimoclomol for the treatment of Niemann-Pick disease Type C. Please place your selected disclosure in appropriate context by describing the potential review issues.

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Page 2  
Use of Proceeds, page 80

2. We refer to comment 8 in our letter dated July 27, 2020. Please specify how far in the development of each of your programs you expect to reach with the proceeds of the offering. If any material amounts of other funds are necessary to accomplish the specified purposes, state the amounts and sources of other funds needed for each specified purpose and the sources. Refer to Item 3.C.1 of Form 20-F.  
Exhibits

3. Please have counsel file a revised Exhibit 5.1 opinion that does not include the assumptions set forth in Section 2.d. Refer to Staff Legal Bulletin No. 19, Section II.B.3.a.  
You may contact David Burton at 202-551-3626 or Mary Mast at 202-551-3613 if you have questions regarding comments on the financial statements and related

matters. Please  
contact Alan Campbell at 202-551-4224 or Christine Westbrook at 202-551-5019  
with any other  
questions.

FirstName LastNameKim Stratton

Corporation Finance  
Comapany NameOrphazyme A/S

Sciences

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cc: Joshua A. Kaufman, Esq.

FirstName LastName

Sincerely,

Division of

Office of Life