



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 3561

October 16, 2009

*By U.S. Mail and facsimile to 86-1058907524*

Mr. Liang Yuan  
Chief Executive Officer  
Origin Agritech Limited  
No. 21 Sheng Ming Yuan Road  
Changping District  
Beijing 102206  
China

**Re: Origin Agritech Limited**  
**Form 20-F for Fiscal Year Ended September 30, 2008**  
**Filed April 3, 2009**  
**File No. 000-51576**

Dear Mr. Yuan:

We have completed our review of your Form 20-F and related filings and have no further comments at this time.

Sincerely,

Ryan C. Milne  
Accounting Branch Chief