



DIVISION OF  
CORPORATION FINANCE

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

December 19, 2018

David S. Bryson  
Chief Financial Officer  
Hudbay Minerals Inc.  
25 York Street, Suite 800  
Toronto, Ontario  
Canada M5J 2V5

**Re: Hudbay Minerals Inc.**  
**Form 40-F for the Year Ended December 31, 2017**  
**Filed March 30, 2018**  
**File No. 001-34244**

Dear Mr. Bryson:

We have completed our review of your filing. 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 Beverages, Apparel and  
Mining