



DIVISION OF
CORPORATION FINANCE

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

March 24, 2014

Via E-mail
Joseph Ragan
Chief Financial Officer
Globe Specialty Metals, Inc.
600 Brickell Avenue, Suite 1500
Miami, FL 33131

**Re: Globe Specialty Metals, Inc.
Form 10-K for the Fiscal Year Ended June 30, 2013
Filed August 28, 2013
Response Dated February 5, 2014
File No. 001-34420**

Dear Mr. Ragan:

We have reviewed your filing and response 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 within ten business days by providing the requested information, or by advising us when you will provide the requested response. If you do not believe our comments apply to your facts and circumstances, please tell us why in your response.

After reviewing the information you provide in response to these comments, we may have additional comments.

Form 10-K for the Fiscal Year Ended June 30, 2013

1. We have received and reviewed your letter of February 5, 2014 and your information appears to indicate that the mining operations are material to your company. As a result disclosure conforming to Industry Guide 7 is required. In your future filings, please include all the additional disclosure as required by Industry Guide 7 describing your mineral rights, mining operations, and your reserves.

Joseph Ragan
Globe Specialty Metals, Inc.
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You may contact George Schuler, Mining Engineer at 202-551-3718 regarding this engineering comment.

Sincerely,

/s/Tia L. Jenkins

Tia L. Jenkins
Senior Assistant Chief Accountant
Office of Beverages, Apparel, and
Mining