



DIVISION OF  
CORPORATION FINANCE

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

March 19, 2020

Johnny Cheng  
Chief Financial Officer  
Hutchison China MediTech Ltd  
Level 18, Metropolis Tower  
10 Metropolis Drive  
Hung Hom, Kowloon  
Hong Kong

**Re: Hutchison China MediTech Ltd**  
**Form 20-F for the Fiscal Year Ended December 31, 2018**  
**Form 6-K filed July 30, 2019 for the Month of July 2019**  
**File No. 001-37710**

Dear Mr. Cheng:

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 Life Sciences