



DIVISION OF  
CORPORATION FINANCE

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

November 1, 2012

Via E-mail

Mr. Chris Thiris  
Chief Financial Officer  
Alumina Ltd  
Level 12, IBM Centre  
60 City Road  
Southbank, Victoria 3006  
Australia

**Re: Alumina Ltd**  
**Form 20-F for the Fiscal Year Ended December 31, 2011**  
**Filed April 25, 2012**  
**File No. 001-10375**

Dear Mr. Thiris:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ John Reynolds

John Reynolds  
Assistant Director