

SAPPI LTD  
Form 6-K  
January 16, 2008

Sappi Limited

**Corporate Accounting**  
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Ms Jennifer Thompson  
United States Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549  
United States of America

January 16, 2008

Form 20-F, for the fiscal year ended October 1, 2006, Filed December 15, 2006  
Form 6-K, filed August 8, 2007  
File No. 1-14872  
Response to the Securities and Exchange Commission letter dated January 4, 2008

Dear Ms Thompson:

We, Sappi Limited, a company incorporated under the laws of the Republic of South Africa (the "Company"), have set forth below the Company's responses to the comments received from the Staff of the Securities and Exchange Commission (the "SEC") in its letter dated January 4, 2008, with respect to the Company's Form 20-F for the fiscal year ended October 1, 2006 and the Company's Form 6-K, furnished August 8, 2007. The numbered paragraphs set forth below correspond to the numbered paragraphs in the SEC staff comment letter.

**Comment No. 1**

SEC Staff Comments

FORM 6-K FILED AUGUST 8, 2007

*1. We read in your response to our prior comment 11 that in future quarterly results announcements, you will adjust profit before tax to calculate operating cash flows. While we do not object to this methodology, it is unclear to us why you would use a different methodology in your quarterly cash flow statements than you use in your annual cash flow statements. In this regard, we note that in your annual cash flow statements, you adjust profit after tax to*

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*calculate operating cash flows. While we assume that this does not result in a different subtotal for your cash generated by operations, please explain how using a different methodology in your interim financial statements is consistent with the principle of presenting annual and interim financial statements on the same basis to allow comparability. Please tell us how you will address this comment in future filings.*

Directors: E van As (*Chairman*), R J Boëttger (Chief Executive Officer), D C Brink, Dr D C Cronjé, Prof M Feldberg (USA), J E Healey (USA), Dr D Konar, H C Mamsch (Germany), Mr J D McKenzie, Mrs K R Osar (USA), Mrs B Radebe, Sir A N R Rudd (UK), Dr F A Sonn, M R Thompson  
Secretaries: Sappi Management Services (Pty) Ltd (Reg. No. 1989/001134/07)

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Company's Response to Comment 1

We note the SEC Staff comments, and will, in future quarterly results announcements, adjust profit after tax to calculate operating cash flows.

If you would like to discuss the Company's response to the comment, please contact the undersigned.

Yours faithfully,

By:/s/ L.J. Newman

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Mr. Laurence Newman  
Group Financial Controller  
Sappi Limited

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Copy to:

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