## LATHAM@WATKINS

May 11, 2021

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## VIA EDGAR AND HAND DELIVERY

United States Securities and Exchange Commission Division of Corporation Finance 100 F Street, N.E. Washington, D.C. 20549-6010

Attention: Mandy Hooker

John Cash Geoff Kruczek Asia Timmons-Pierce

Re: Oatly Group AB

**Registration Statement on Form F-1** 

Filed on April 19, 2021 CIK No. 0001843586

Ladies and Gentlemen:

On behalf of Oatly Group AB, previously referred to as Havre Global AB (the "Company"), we are hereby filing Amendment No. 1 ("Amendment No. 1") to the Registration Statement on Form F-1 (Registration No. 333-255344) filed with the Commission on April 19, 2021 (the "Registration Statement"). The Company previously submitted a Draft Registration Statement on Form F-1 on a confidential basis pursuant to Title I, Section 106 under the Jumpstart Our Business Startups Act with the Securities and Exchange Commission (the "Commission") on February 12, 2021, as amended on March 25, 2021 ("Submission No. 2"). Amendment No. 1 has been revised to reflect the Company's responses to the comment letter to the Registration Statement received on April 27, 2021 from the staff of the Commission (the "Staff").

For ease of review, we have set forth below each of the numbered comments of your letter in bold type followed by the Company's responses thereto.

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1. Notwithstanding your response to prior comment 1 that you will not be a "controlled company," it continues to appear from your disclosure that the PRC will have a significant ownership interest in you and, therefore, have significant influence over decisions that require shareholder approval. If so, please revise to disclose that fact and that risks to investors.

*Response*: The Company respectfully acknowledges the Staff's comment and has revised pages 16, 51 and 52 of Amendment No. 1.

\* \* \*

We hope the foregoing answers are responsive to your comments. Please do not hesitate to contact me by telephone at (212) 906-1281 with any questions or comments regarding this correspondence.

Very truly yours,

/s/ Marc D. Jaffe Marc D. Jaffe of LATHAM & WATKINS LLP

cc: (via email)
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