

August 14, 2023

Beck Chen  
Chief Financial Officer  
Dada Nexus Ltd  
22/F, Oriental Fisherman s Wharf  
No. 1088 Yangshupu Road  
Yangpu District, Shanghai 200082  
People s Republic of China

Re: Dada Nexus Ltd  
Form 20-F for the

Fiscal Year Ended December 31, 2022

File No. 001-39305

Dear Beck Chen:

We have limited our review of your filing to the submission and/or disclosures as required by Item 16I of Form 20-F 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 these comments within ten business days by providing the requested information or advise us as soon as possible when you will respond.

After reviewing your response to these comments, we may have additional comments.

Form 20-F for the Fiscal Year Ended December 31, 2022

Item 16I. Disclosure Regarding Foreign Jurisdictions that Prevent Inspections, page 150

1. We note your statement that you reviewed the Company s register of members and public filings made by shareholders in connection with your required submission under paragraph (a). Please supplementally describe any additional materials that were reviewed and tell us whether you relied upon any legal opinions or third party certifications such as affidavits as the basis for your submission. In your response, please provide a similarly detailed discussion of the materials reviewed and legal opinions or third party certifications relied upon in connection with the required disclosures under paragraphs (b)(2) and (3).

2. In order to clarify the scope of your review, please supplementally describe the steps you have taken to confirm that none of the members of your board or the boards of your consolidated foreign operating entities are officials of the Chinese Communist Party. For

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instance, please tell us how the board members current or prior memberships on, or affiliations with, committees of the Chinese Communist Party factored into your determination. In addition, please tell us whether you have relied upon third party certifications such as affidavits as the basis for your disclosure.

3. We note your list of subsidiaries in Exhibit 8.1 appears to indicate that you have subsidiaries in Hong Kong and British Virgin Islands as well as in PRC that are not included in your VIEs. Please note that Item 16I(b) requires that you provide disclosures for yourself and your consolidated foreign operating entities, including

variable interest  
entities or similar structures.

With respect to (b)(2), please supplementally clarify the  
jurisdictions in which your  
consolidated foreign operating entities are organized or  
incorporated and provide the  
percentage of your shares or the shares of your consolidated  
operating entities owned  
by governmental entities in each foreign jurisdiction in which you  
have consolidated  
operating entities in your response.

With respect to (b)(3) and (b)(5), please provide the information  
required by (b)(3)  
and (b)(5) for you and all of your consolidated foreign operating  
entities in your  
supplemental response.

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.

Please contact Jimmy McNamara at 202-551-7349 or Andrew Mew at  
202-551-3377  
with any questions.

FirstName LastNameBeck Chen

Corporation Finance  
Comapany NameDada Nexus Ltd

Program  
August 14, 2023 Page 2  
cc: Yuting Wu  
FirstName LastName

Sincerely,

Division of

Disclosure Review