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ASA LTD
Form 13F-HR
October 19, 2004

OMB APPROVAL

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

FORM 13F

FORM 13f Cover Page

Report for the Calendar Year or Quarter Ended September 30, 2004

If amended report check here: Amendment Number: _____

This Amendment (Check only one): is a restatement
 adds new holding
entries.

ASA Limited

Name of Institutional Investment Manager

36 Wierda Road West Sandton South Africa 2196

Business Address (Street) (City) (State) (Zip)

13F File Number: 28-10658

The institutional investment manager filing this report and the person by whom it is signed hereby represent that the person signing the report is authorized to submit it, that all information contained herein is true, correct and complete, and that it is understood that all required items, statements, schedules, and tables, are considered integral parts of this form.

Person Signing this Report on Behalf of Reporting Manager:

Robert J.A. Irwin Chairman & Treasurer 716-883-2428

Name (Title) (Phone)

/s/ Robert J.A. Irwin

(Manual Signature of Person Duly

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Authorized to Submit This Report)

Buffalo, New York October 19, 2004

(Place and Date of Signing)

Report Type:

- [X] 13F HOLDINGS REPORT.
[] 13F NOTICE.
[] 13F COMBINATION REPORT.

Form 13F SUMMARY PAGE

Report Summary:

Number of Other Included Managers: 0
Form 13F Information Table Entry Total: 5
Form 13F Information Table Value Total: \$111,110
(thousands)

List of Other Included Managers:

Name and 13F file numbers of ALL Institutional Investment Managers with respect to which this schedule is filed (other than the one filing this report): (List in alphabetical order).

[If there are no entries in this list, state "NONE" and omit the column headings and list entries.] None

FORM 13F
INFORMATION TABLE

ITEM 1	ITEM 2	ITEM 3	ITEM 4	ITEM 5	ITEM 6		
NAME OF ISSUER	TITLE OF CLASS	CUSIP NUMBER	FAIR MARKET VALUE (x\$1000)	SHARES OR PRINCIPAL AMOUNT	INVESTMENT DISCRETION SOLE (A)	SHARED (B)	OTHER SHARED (C)
Barrick Gold Corp.	Common Stock	067901108	15,359	730,000 SH	Sole		

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Compania de Minas Buenaventura	Sponsored ADR	204448104	21,375	900,000 SH	Sole
Harmony Gold Mining Ltd.	Sponsored ADR	413216300	29,506	2,166,400 SH	Sole
Newmont Mining Corp.	Common	651639106	23,692	520,368 SH	Sole
Placer Dome, Inc.	Common	725906101	21,178	1,065,312 SH	Sole