ASA LTD Form 13F-HR July 30, 2004

			OMB APPROVAL		
			OMB Number: Expires: Estimated average burden hours per response		
			SEC USE ONLY		
S	ECURITIES A	UNITED STATES AND EXCHANGE COMM ngton, D.C. 20549	ISSION		
		FORM 13F			
	FORI	M 13f Cover Page			
Report for t	he Calenda:	r Year or Quarter	Ended June 30, 2004		
If amended report check	here:	1_1	Amendment Number	r:	
This Amendment (Check on	ly one):	_  is a restater  _  adds new hold entries.	nent ding		
ASA Limited					
Name of Institutional In	vestment Ma	anager			
36 Wierda Road West			South Africa		
Business Address					
13F File Number: 28-1065	8				

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	716-883-2427
Name	(Title)	(Phone)

/s/ Robert J.A. Irwin \_\_\_\_\_

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(Manual Signature of Person Duly Authorized to Submit This Report)

Buffalo, New York July 30, 2004

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(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: \$95,146 (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	
			FAIR		INVEST	MENT DIS	CRETION
	TITLE		MARKET	SHARES OR			SHARED
NAME OF ISSUER	OF	CUSIP	VALUE	PRINCIPAL	SOLE	SHARED	OTHER
	CLASS	NUMBER	(x\$1000)	AMOUNT	(A)	(B)	(C)

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Barrick Gold Corp.	Common Stock	067901108	14,418	730,000 SH	Sole
Compania de Minas Buenaventura	Sponsored ADR	204448104	19,890	900,000 SH	Sole
Harmony Gold Mining Ltd.	Sponsored ADR	413216300	22,942	2,166,400 SH	Sole
Newmont Mining Corp.	Common	651639106	20,169	520,368 SH	Sole
Placer Dome, Inc.	Common	725906101	17,727	1,065,312 SH	Sole