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ASA BERMUDA LTD
Form 13F-HR
May 06, 2005

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 March 31, 2005

If amended report check here: Amendment Number: _____

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

ASA (Bermuda) Limited

Name of Institutional Investment Manager

11 Summer Street, 4th Floor Buffalo, New York 14209-2256

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

13F File Number: 28-11034

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, President & 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 May 6, 2005

(Place and Date of Signing)

Report Type:

- 13F HOLDINGS REPORT.
- 13F NOTICE.
- 13F COMBINATION REPORT.

Page 1

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: \$94,156
(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 | | |
|----------------|--------|--------|-----------|-----------|----------------|--------|----|
| | TITLE | CUSIP | FAIR | SHARES OR | INVESTMENT DIS | | |
| NAME OF ISSUER | OF | NUMBER | MARKET | PRINCIPAL | SOLE | SHARED | OT |
| | CLASS | | VALUE | AMOUNT | (A) | (B) | (|
| | | | (x\$1000) | | | | |

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| | | | | | |
|--------------------------------|---------------|-----------|--------|--------------|------|
| Barrick Gold Corporation | Common Stock | 067901108 | 17,491 | 730,000 SH | Sole |
| Compania de Minas Buenaventura | Sponsored ADR | 204448104 | 20,502 | 900,000 SH | Sole |
| Harmony Gold Mining Limited | Sponsored ADR | 413216300 | 16,898 | 2,166,400 SH | Sole |
| Newmont Mining Corporation | Common | 651639106 | 21,986 | 520,368 SH | Sole |
| Placer Dome, Inc. | Common | 725906101 | 17,279 | 1,065,312 SH | Sole |