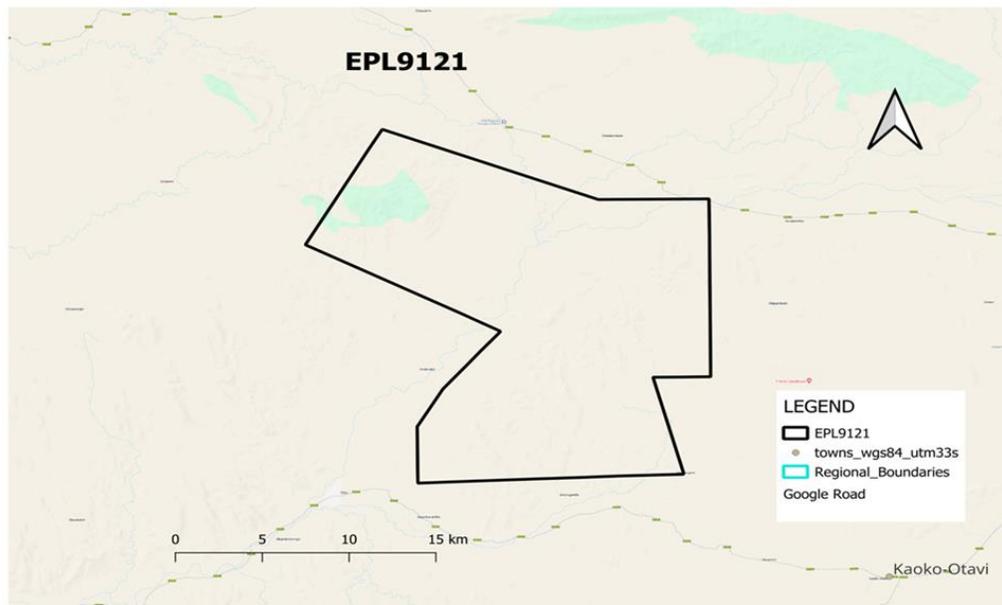




Application No: 250224005419

Environmental Management Plan for Proposed Exploration Activities of Base & Rare Metals, Dimension Stone, Industrial Minerals, Precious Metals on Exclusive Prospecting License 9121 at South of Opuwo in Kunene Region

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ACRONYMS

DEA	Department of Environmental Affairs
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
EC	Environmental Commissioner
ECC	Environmental Clearance Certificate
ECO	Environmental Compliance Officer
EIA	Environmental Impact Assessment
EM	Epangelo Mining
EMA	Environmental Management Act (No. 7 of 2007)
EMP	Environmental Management Plan
EPL	Exclusive Prospecting License
I&APs	Interested and Affected Parties
MEFT	Ministry of Environment, Forestry and Tourism
PPE	Personal Protective Equipment
RC	Reverse Circulation
RD	Red-Dune Consulting CC
TORs	Terms of Reference

I. EXECUTIVE SUMMARY

JG Investment Three Pty Ltd plans to conduct exploration activities for base metals, rare earth elements, precious metals, dimension stone and industrial minerals within Exclusive Prospecting License (EPL) 9121. This license covers approximately 58,227.884 hectares in a remote section of the Kunene Region, an area predominantly used for livestock farming and known for its rugged terrain and diverse cultural heritage.

From 30th September 2021 to 30th September 2024, Epangelo Mining Pty Ltd, the parent company of JG Investment Three (Pty) Ltd, owned EPL 6877 south of Opuwo in the Kunene Region, as per the Mineral Resources Act of 1992. Upon the expiration of its Environmental Clearance Certificate (ECC) in September 2024, Epangelo Mining opted to apply for an extension of the EPL's size, but under its subsidiary, JG Investment Three (Pty) Ltd. As a result, the EPL number was changed from 6877 to 9121.

An Environmental Impact Assessment (EIA) for the project was conducted, which included a comprehensive evaluation of potential impacts and benefits associated with the project as well as tailored mitigation measures to address identified impacts and ensure that the project adheres to both local and international environmental standards. Key recommendations for mitigation include waste management, and adherence to a robust Environmental and Management Plan (EMP) to ensure that the project activities minimizes any negative effects on the surrounding environment.

Exploration activities, when conducted with care, are generally not harmful to the environment. Particular attention will be paid during line cutting operations to avoid mature and protected trees, ensuring minimal disturbance to the local flora. Therefore, it is recommended that the approving authority grant approval and issue an Environmental Clearance Certificate for the project.

1. OVERVIEW

This Environmental Management Plan (EMP) is based on the detailed Environmental Impact Assessment (EIA) for Exclusive Prospecting License (EPL) 9121. The EIA report outlines the project description and impact assessment, while this EMP provides strategies to mitigate identified risks and ensure environmentally responsible exploration practices.

2. PURPOSE OF THE EMP

The Environmental Management Plan (EMP) serves as a comprehensive risk management strategy designed to address and mitigate potential environmental impacts associated with the project. It provides a clear logical framework that outlines what needs to be done, how it will be monitored, and the steps to reduce potential negative effects on the environment. The EMP also includes strategies to ensure that environmental considerations are part of every stage of the project and clearly defines roles and responsibilities for all individuals involved in the project.

3. COMPLIANCE TO THE EMP

This Environmental Management Plan (EMP) is a legally binding document, as stipulated under the provisions of the Environmental Management Act, 2007 (Act No. 7 of 2007). It is imperative that JG Investment Three Pty Ltd and its contractor strictly adhere to the framework outlined in this document. This includes following the prescribed mitigation measures, and management strategies. Non-compliance with the EMP could result in legal consequences and potentially disrupt the project's operations. Therefore, it is essential that all parties involved understand and implement the provisions of the EMP to ensure smooth operation of the project.

4. ROLES AND RESPONSIBILITY

Table 1. Roles and Responsibility

Role	Responsibility
Proponent: <i>JG Investment Three Pty Ltd, a subsidiary of Epangelo Mining Pty Ltd</i>	Overall responsibility for ESMP implementation, ensuring compliance and monitoring.
Site Manager	Daily supervision of site activities, ensuring environmental protection measures are adhered to.
Environmental Compliance Officer (ECO)	Monitoring, inspections, ensuring compliance with environmental standards.
Contractors	Implementing mitigation measures, adhering to environmental guidelines, reporting issues.
Environmental Health Officer (EHO)	Ensuring compliance with health-related environmental regulations.
Ministry of Environment, Forestry and Tourism (MEFT)	Providing oversight and guidance on environmental compliance.
Other regulatory Authorities	Ensuring the project activities align with their mandate

5. POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

Namibia has developed a comprehensive set of policies, regulatory frameworks, and institutions designed to ensure the conservation, sustainable use, and equitable sharing of natural resources, biodiversity, and ecosystems (*Table 2*). These efforts are in alignment with both international conventions and national legislation. In addition to its domestic policies, Namibia is a signatory to several international treaties, conventions, and multilateral agreements, which further guide its environmental governance.

The country actively participates in various international standards, such as the United Nations Development Programme’s Social and Environmental Standards (UNDP’s SES) and engages in reviews and processes that are critical to the sustainable management of natural resources and the protection of basic rights, including access to a clean and healthy environment.

Table 2. Regulatory framework applicable to the project

Legislation	Summary	Applicability to Assessment
<p>The Namibian Constitution</p>	<p>The State shall actively promote and maintain the welfare of the people by adopting policies aimed at the maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present and future</p>	<p>Protection of the environment and biodiversity. Ensures that these principles are enshrined in the EIA documentation</p>

Legislation	Summary	Applicability to Assessment
Environmental Management Act No. 7 of 2007	To promote sustainable management of the environment and the use of natural resources and to provides for a process of assessment and control of activities which may have significant effects on the environment; and to provide for incidental matters	The Act provides a list of activities that may not be undertake without an environmental clearance certificate to prevent environmental damages.
Mineral Resource Act, Act 1992.	Prospecting and Mining of Mineral in Namibia and Issuance of all Permits.	Issuance of Mining permits
Draft Pollution Control and Waste Management Bill	This Bill serves to regulate and prevent the discharge of pollutants to air and water as well as providing for general waste management.	To protect the Environment from possible hydrocarbons and oil leaks from the machinery, trucks and vehicles.
Environmental Policy framework (1995)	This policy subjects all developments and project to environmental assessment and provides guideline for the Environmental Assessment.	Consideration of all possible impacts and incorporate them in the development stages
Regulations Related to the Health and Safety of Employees at Work. Reg No. 156	Promotes the Safety and Health of employees at the workplace	To ensure employees health and safety at work
Public Health Act No. 36 of 1919	To Protect the public from nuisance and states that no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health.	To ensure that the project is not a nuisance to landowners and the public at large

Legislation	Summary	Applicability to Assessment
Labour Act No. 11 of 2007	This Act outlines the labour laws which encompass protection and safety of employees at work.	Fair labour practises to be observed with regard to this act
Water Act No, 54 of 1956	All water resources belong to the State. It prevents pollution and promotes the sustainable utilization of the resource	Prevention of discharging contaminated water at unauthorised places
Soil Conservation Act No. 76 of 1969	To promotes the conservation and compacting of soil erosion	Uncontrolled movement of heavy vehicles and truck at areas surrounding the site may cause land degradation
Water Resource Management Act No.11 of 2011	The Act stipulates the prevention of pollution for Surface and Ground water sources.	Oil spillage coming from machinery requires proper monitoring.
Public Health Act no. 36 of 1919	The Act gives provision for the protection for the health of all people.	The noise and dust level emanating from the project could affect the surrounding community and vegetation in the vicinity.
National Heritage Act No.27 of 2004	The Act gives provision of the protection and conservation of places and objects with heritage significance.	The chance find of Human Remains due to colonial history or crime, Artefacts, and or heritage materials within the EPL
Minerals (Prospecting and Mining) Act No 33 of 1992	Section 50 (i) requires “an environmental impact assessment indicating the extent of any pollution of the environment before any prospecting operations or mining operations are being carried	The proposed activity is prospecting for minerals; hence it requires an EIA to be carried out and adhere to the act’s provisions.

Legislation	Summary	Applicability to Assessment
	out and an estimate of any pollution, if any, likely to be caused by such prospecting operations or mining operations”	

6. MITIGATION MEASURE TABLES

The mitigation measure tables are systematically structured to address specific social and biophysical environmental issues that may arise throughout the project cycle. To gain a clearer understanding of the broader context, readers are advised to refer to EIA / scoping report for a comprehensive analysis of potential impacts as it provides in-depth insights into the environmental and social risks associated with the project and serves as a foundational document that informs the development of the mitigation strategies outlined in this EMP.

Table 3. Mitigation Measures and Monitoring Requirements

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
Access	To avoid conflict between JG Investments Three Pty Ltd and local people	<ol style="list-style-type: none"> 1. Inform Chiefs well in advance before your planned activities 2. Do not enter the area without owners' consent 	Recorded conflict Identification documents	Proponent / Site Manager
Induction	To ensure that all employees are familiar with the requirements of the EMP	<ol style="list-style-type: none"> 1. All employees must go through an induction course for the provision of the EMP. 2. Staff operating specialised equipment and heavy vehicle must be properly trained 	Induction minutes, training reports, and attendance registers	Site Manager
Employment / Socio-Economic advancement of local	Although significant employment is not expected, the proponent must abide to the relevant labour laws	<ol style="list-style-type: none"> 1. Ensure that all general work is reserved for local people unless in circumstances where specialized skills are required. 2. Fair compensation and labour practise as per Namibian Labour Laws must be followed 3. Ensure skill transfer to the locals 	Employees records Labour unrest over unfair compensation Document training sessions, and other capacity-building efforts to monitor the extent and success of	Site Manager

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
			skill transfer initiatives.	
HIV/AIDS, Alcohol and Drug abuse	To sensitise employees about the danger of alcohol, drugs and HIV/AIDS	<ol style="list-style-type: none"> 1. Provide awareness to the employees on danger of alcohol, (HIV/AIDS) and drug abuse 2. Provide condoms to workers to promote safe sex practices. 	Awareness meeting minutes	Site Manager
General Safety	To ensure good health and safety for the employees and public	<ol style="list-style-type: none"> 1. Abide by the Occupational Health and Safety and Labour Act of Namibia and other statutory requirement such as International Labour Practise (ILO) 2. Develop a health and safety plan / policy 3. Ensure that every employee went through an induction course about safety. 4. Employees must be equipped with all necessary Personal Protective Equipment (PPE). These includes, Helmet, Overall, Safety Shoes, Safety Glasses, Gloves, Earmuff etc. 	Induction Minutes Valid driver licenses for heavy vehicles Complain of health issues by employees PPE for all employees Health certificates records	Site Manager

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
		<ol style="list-style-type: none"> 5. During operations, minor accidents are likely to occur; therefore, it is essential to have a well-stocked first aid kit readily available on-site 6. Only qualified and licenced personnel must be allowed to operate machinery and vehicles. 7. No employee must be allowed to be onsite without PPE. 8. Adequate safety signs must be displayed on site. 9. Unauthorised fire shall not be permitted on site. 		
Health	To ensure good health for the employees	<ol style="list-style-type: none"> 1. Employees must NOT be exposed to noise levels above the required -85dB (A) limit over a period of 8 hours. 2. Adhere to the Labour act, non-toxic human dust exposure levels may not exceed 5mg/m³ for respiratory dust and 15mg/m³ for total dust. 	Complain from farmers Health complaints from employee and employee's fitness certificate	Site Manager

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
		<ol style="list-style-type: none"> 3. Supply clean drinking water to the site, such as portable water tank 4. Use mobile toilets 5. Ensure that supervisor has gone through occupational health and first aid course, 6. Train employee on hazard and risk avoidance 7. Provide insect repellent, mosquito nets and if necessary, immunization to prevent deadly diseases such as malaria, 		
Visual Impact	To prevent litter and waste from being scattered and to preserve the aesthetic value of the area	<ol style="list-style-type: none"> 1. Maintain proper site housekeeping practices to ensure a clean and organized exploration area. 2. Trenches, access roads, camping places must be rehabilitated 3. Place waste collection bins at designated points and ensure regular waste disposal 	Scattered Litter, Visual inspection	Site Manager
Traffic	To ensure coordinated	<ol style="list-style-type: none"> 1. Trucks must be installed with a rotating headlight beam light 	Records of public complain Visible warning signs	Site Manager

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
	movement of heavy vehicles	<ol style="list-style-type: none"> 2. Truck must maintain a low speed to prevent excessive dust and accident 3. The roads must be maintained by scrapping and compacting 4. Install warning signs where necessary 		
Archaeology /Heritage Resources Artefacts	Preserve Heritage	<ol style="list-style-type: none"> 1. Employee must be trained on the possible find of heritage and archaeological material in the area; 2. Implement a chance find and steps to be taken for heritage or archaeological material finding (Heritage (rock painting and drawings), human remains or artefacts) are unearthed Stopping the activity immediately <ol style="list-style-type: none"> i. Informing the operational manager or supervisor ii. Cordoned of the area with a danger tape and manager to take appropriated pictures. iii. Manager/supervisor must report 	Sighting report/s of heritage resources / artefacts	Management or Site Manager

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
		<p>the finding to the competent authorities National Heritage Council of Namibia (061 244 375) National Museum (+264 61 276800) or the National Forensic Laboratory (+264 61 240461).</p>		

Table 4. Bio-Physical Environment: Impacts Assessment

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
Biodiversity: Flora	To ensure sustainable conservation the vegetation	<ol style="list-style-type: none"> 1. Mature trees should be preserved and not cut down 2. Do not harvest firewood 3. Educate employees and stakeholders about the importance of protecting native flora. 4. Ensure that access roads are rehabilitated after use to enhance revegetation 	Complaints, records and Monitoring Reports on Vegetation Status	Site Manager
Biodiversity: Fauna	To ensure the protection of animals, particularly wildlife	<ol style="list-style-type: none"> 1. Refrain from harming or killing animals found on-site unless they present an immediate and unavoidable threat to human life. 2. There must be ZERO tolerance to poaching 3. Implement wildlife monitoring to track animal movements and prevent disturbances to habitats 	Complaints from farmers, record of poaching and wildlife monitoring reports	Site Manager

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
Conservation of Ground Water Resource	To prevent exposure of ground water	<ol style="list-style-type: none"> 1. Ensure that drilled holes are properly closed to prevent ground water exposure unless otherwise as agreed with the locals 2. Use of Environmentally Friendly Drilling Fluids Utilize drilling fluids that are non-toxic and biodegradable to minimize contamination risks 3. Comply with the Water Resources Management Act 11 of 2013, which mandates the management, protection, development, use, and conservation of water resources in Namibia 	Rehabilitated drilled sites	Site Manager
Surface and Ground water pollution	To prevent water pollution	<ol style="list-style-type: none"> 1. Fuelling of heavy vehicle on site must be well coordinated at designated places 2. Stationary vehicles must be provided with drip tray to capture oil, lubricants and hydraulic fluids leakages 3. All vehicle and machinery must be well service to avoid leakages 4. Provide and train on oil spill emergency 	Physical inspection	Site Manager

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
		<p>response</p> <p>5. Servicing of vehicles and machinery must take place at designated sites</p>		
Land Degradation	To prevent soil erosion	<p>1. Movement of heavy vehicles must be coordinated and restricted to be on access roads</p> <p>2. Normally, gravel roads are meant for light vehicles, exploration vehicles have the potential to damage the farm access roads. Hence proper road maintenance must be implemented to ensure that the roads are left on good state</p>	Physical inspection	Site Manager
Waste Generation	To ensure good housekeeping and prevent littering	<p>1. Provide Skip bins to collect waste and be disposed of at an approved disposal site</p> <p>2. Do not bury waste on site</p> <p>3. Excavate a small biodegradable waste site that would be dump filled at the end of the project alternatively, provide mobile toilets that will be disposed at an approved municipal site</p>	<p>Waste bins on site</p> <p>Physical inspection</p>	Site Manager

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
		4. Used oil, grease and lubricants cans must be collected in appropriate drums and disposed of at an approved site.		
Noise Impacts	To prevent noise pollution from flying aircraft	<ol style="list-style-type: none"> 1. The aircraft must fly at heights which may not cause noise nuisance to animals 2. A fixed wing aircraft is recommended than a helicopter 	Complaints from farmers and members of public	Site Manager
Oil Leakages	Manage fuels, oils and lubricants leakages from Vehicles and Machinery to prevent pollution	<ol style="list-style-type: none"> 1. Ensure all vehicles are well service and leak inspection are done; 2. Provide drip trays to stationary vehicle 3. Servicing of vehicle must be done at an approved site or at areas agreed with the farm owner. 4. Re-fuelling, oil replacement must be done on approved sites; 	Physical verification and routine monitoring	Management or Site Manager

7. CLOSURE / DECOMMISSIONING PLAN

The exploration activities do not necessarily culminate in a decommissioning phase but rather transition into a rehabilitation phase. This rehabilitation process is designed to restore the environment by addressing the physical footprints created during exploration, including access roads, trenches, and drilled holes that should be rehabilitated immediately after use to restore the landscape. This might involve re-vegetation efforts to reintroduce native plant species and stabilize soil structures.

Following geochemical sampling with drilling equipment, all casings must be removed, and drill holes must be securely sealed to prevent environmental hazards (see Figure 1). However, if mutually agreed upon with local communities, casings may be left in place to facilitate the creation of water boreholes, providing lasting benefits to residents.

Additionally, waste dumps containing biodegradable materials must be backfilled to prevent environmental degradation. Any pit latrines constructed during the exploration period should also be properly closed and rehabilitated to ensure that they do not pose health or environmental risks. Moreover, all infrastructure built for exploration purposes should be dismantled or repurposed where feasible, ensuring that the site returns as closely as possible to its original state.



Figure 1. RC drill hole after rehabilitation (Image for illustration purposes).

8. CONCLUSIONS AND RECOMMENDATIONS

8.1. Conclusion

The Environmental Impact Assessment (EIA) has successfully identified, assessed, and addressed the potential environmental and social impacts associated with the project. In terms of waste management, health and safety, heritage and archaeology and socio-economic impacts, mitigation strategies have been identified to ensure minimal environmental degradation and social disturbance to minimize negative environmental impacts.

With adequate implementation of this EMP, the proposed exploration activities are expected to be conducted in an environmentally sustainable manner. However, if the exploration leads to the establishment of a mine, it will be essential to conduct a comprehensive Environmental and Social Management Plan (ESMP must be developed to ensure that appropriate mitigation measures are implemented to protect the environment throughout the mine's lifecycle.

8.2. Recommendations

1.1.1 Management Recommendations

To ensure that the project is implemented with minimal adverse environmental and social impacts, it is recommended that management implement the following:

- a) Implement a continuous monitoring of biodiversity throughout the project's lifecycle and undertake regular environmental audits and reporting monitor the effectiveness of mitigation measures.
- b) Engage with local communities regularly to ensure their concerns are addressed, particularly regarding health, safety, and social dynamics.
- c) Implement a strict waste management protocol for both solid and hazardous waste. Ensure that all waste is properly segregated, stored, and disposed of in compliance with national and international environmental standards.
- d) All employees, contractors, and stakeholders should undergo regular training on environmental and social responsibility, to ensure full compliance with the EMP.

1.1.2 Regulator Recommendation

Based on the finding of the EIA and the developed mitigation measures (EMP), it is recommended that the approving authority issue the Environmental Clearance Certificate (ECC) for the project. Moreover, the approving authority is advised to conduct periodic environmental inspections to ensure compliance. Furthermore, regular oversight will help identify any emerging issues early, enabling timely corrective actions to be taken and ensuring that the project continues to meet regulatory standards and best practices for environmental protection.

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