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REPORT

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CONCLUSIONS
FROM COMET



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FOREWORD

The discussion on complementary pathways – pathways for refugees outside the asylum system or established channels like resettlement – has over the last decade advanced in several countries in Europe. While some pathways are in a pilot phase or in the planning, others have already been in place for a decade, and considerable experience and knowledge about their implementation has therefore been gathered.

The COMplementary pathways nETwork (COMET) project sought to harness experience from new and established stakeholders alike. Whilst the implementation of coordinated pathways for 130 beneficiaries was the practical aim at the heart of the project, a strengthened network and the exchange, building and dissemination of knowledge, standards and practice on complementary pathways were of equal importance.

Despite a changing and at times adverse context, the project succeeded in creating pathways for 121 beneficiaries and in developing and sharing invaluable expertise.

This briefing paper presents to the interested reader some spotlights on the achievements and challenges of the project and suggests further reading on the issues covered by the project and its results.

It also offers some insights into the reflections of project partners on the results of the project and future recommendations based on questionnaires completed by project partners and a number of thematic in depth studies.

We hope this briefing paper will encourage further reflection, exchange, development of a favourable environment and implementation of complementary pathways.

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COMET IN A NUTSHELL

COMET was an AMIF-funded transnational partnership project involving organisations based in Italy, Spain, France, Germany, the Netherlands, Belgium and United Kingdom. The name "COMET", an acronym for COMplementary pathways nETwork suggests the main focus but somewhat hides the project's ambitious scope.

Implemented between January 2022 and March 2025, the project "recognise[d] Europe's emerging patrimony of complementary pathways and the potential for disparate legal channels to be developed as an interlocking system rather than a patchwork".¹

Applying a refugee-centric approach, the project considered asylum seekers not only as people in need but in the light of their full potential, aspirations and talents. Practical tools and procedures were developed in view of this.

One aim of the project was to foster collaboration between different stakeholders at a transnational level in order to develop and coordinate network of diverse legal pathways across Europe for people in need of protection trapped along the Central Mediterranean Route. [...] The project outline specified, in relation to identification of participants in the project:

"Whilst the need for international protection is a starting point, beneficiaries will be viewed through a wider lens so that they can be matched to the programme and location best adapted to maximise their potential and eventual contribution to a host society."

¹ Project application

More specifically the project application had identified the following short-, medium-, and long-term goals:

in the short term

- coordinate new and existing legal migration channels for people in need of international protection;
- exchange best practice from diverse models, experiences and contexts;
- develop a structured matching process considering not only protection needs but also geographical, familial and other links, skills and integration potential;
- develop common tools and quality standards in respect of pre-departure orientation, reception and post-arrival support;

in the medium term

- build capacity for host communities;
- deliver 130 additional European admission places for beneficiaries transiting through the Central Mediterranean Route by expansion of existing pathways and creation of new ones;

in the longer term

- monitor, evaluate, learn and share through dialogue, materials and structured exchange;
- provide a basis for continued advocacy to expand legal migration.

Complementary pathways were understood by the project partners according to the UNHCR description:

“Complementary pathways are migration pathways with refugee-specific flexibilities built in, that allow refugees to access work, study and other opportunities outside their countries of origin or asylum. They can also take the shape of programmes created specifically for refugees outside of regular migration programmes or UNHCR-assisted resettlement.

Beneficiaries of complementary pathways are given legal access to a third country through the given pathway, where they can gradually attain a more sustainable permanent status. At the same time, they can support themselves to reach a durable solution.”²

With the Federation of Protestant Churches in Italy (FCEI) as the project lead it is unsurprising that the “Humanitarian Corridor” pathway was one of the inspirations of the project. However, other pathways, such as education pathways for both adults and minors and resettlement supported by community sponsorship were part of the project.

The diverse partnership of 14 different entities consisted mainly of non-governmental actors including diaspora organisations and faith-based organisations. An association of local/supralocal governments academics/think tank and UNHCR also were included in the partnership from the beginning.

The project was funded by the European Commission under the AMIF 2020 call.

2 <https://www.unhcr.org/what-we-do/build-better-futures/long-term-solutions/complementary-pathways>

THE MAIN STARTING POINTS OF THE PROJECT

The action logic of the project followed a didactic approach of joint learning and doing. A detailed common analysis of information on relevant contexts was essential to underpin the project – this included both insights into the situations in key countries of departure as well as admission policies, procedures and structures in European countries.

Based on this, common standard operating procedures and tools were developed, e.g. in relation to pre-departure orientation and post-arrival support. These were then summarised in so-called “framework” documents.

These were then helpful tools for organising departures and arrivals of persons in need of international protection through the different pathways – with the aim of creating additional places for 130 beneficiaries in the different pathways. Results of the practical work were shared through factsheets and in online webinars. A final conference in Barcelona shared results with a wider public and provided specific input into the Spanish-Catalan situation.

The project was, on the one hand, comparable to many Europe-wide EU-funded projects in terms of exchange of best practice and networking. On the other hand, it went well beyond the logic of most similar projects: the basis and aims of the project were not only built on past experiences or future plans but had the movement of 130 persons themselves as central and integral point of the project itself during the project’s lifetime. As will be outlined, whilst this helped to motivate and make the project work very tangible, it also meant that changes in the specific context of these movements had immediate and direct repercussions on project outcomes and deliverables.

The process was supported by a constant feedback loop (e.g. through participatory evaluations) and adjusting working methodology.

BUILDING AND HARMONISING THE PARTNERSHIP, “TUNING THE ORCHESTRA”

An important aspect of the project was establishing common ground, or “tuning the orchestra” – that is enabling partners coming from very different backgrounds and realities to get to know each other – especially their existing operational practices. After that partners would be better placed to agree on joint standards and procedural frameworks.

There were many variables to take into account. Partners not only came from different countries, but also from different sectors – NGO, INGO, association of local/supralocal governments think tank. They were operating or intending to operate different kinds of complementary pathway: education pathways, humanitarian corridors and others. Partners were also at very different starting points: some already had significant experience in operating complementary pathways, whereas others were with the COMET project intending to launch their first complementary pathway. Others were not directly engaged in operating a complementary pathway but in supporting, advocating for, analysing or monitoring such initiatives. Understanding, recognising and learning from these diverse standpoints was then intended to start a process where partners would agree on common concepts.

This mutual understanding and definitions were worked on through kick-off and coordination meetings, as well as through a series of so-called “status quo” meetings, which looked at how different partners

“It was my first time collaborating on a project within the framework of the humanitarian corridor, an experience that deeply enriched me personally and professionally. I was thrilled and moved because it allowed me to explore a deeper dimension of humanitarian work. In particular, I participated in two pre-departure orientation meetings, gaining an even greater understanding of the importance of supporting people through this delicate process. Active listening and practical support are essential for creating a path of inclusion and sharing.

(cont.)

experienced situations in countries of departure and in their own country. The exchange also happened via questionnaire-based research and online exchanges. Online thematic exchanges for smaller groups of partners working on a specific aspect of the project also took place.

While these helped the mutual understanding, many project partners in hindsight acknowledged that an in-person meeting, even if only for one day, might have helped to kick off the project and enable partners to get to know one another properly. Future project development, as well as financial frameworks for supporting projects should cater for this.

Many project partners undertook exchanges with each other whilst a more limited number undertook research visits to each other. These were perceived as very useful and in several cases encouraged partners to try out methods which they had seen in practice at other partners. In addition, some partners were, in cooperation with other partners able to increase their own skills, expertise, knowledge or capacity e.g. on the psychological framework of the beneficiaries. Some project partners are involved in new cooperative efforts which will outlive COMET, be it in multilateral projects or bilateral partnerships.

Whilst some partners reflected that the process of harmonisation and developing trust was complex or, indeed, that there were areas of disagreement, overall, partners felt that they could – to a degree – harmonise procedures and develop trust towards each other.

It emerges from an evaluation carried out at the end of the project that partners differed in their views about the most important achievement(s) of the project. Some partners saw the operational part as most important; others underlined the joint learning and expertise built; others appreciated the reflection on a more conceptual level and yet others felt that making knowledge available to non-project partners and future pathways was the main achievement.

A challenge emerged around the development of some common material on standards and procedures, including checklists. Several of the partners already had for their own operations developed standards and procedures on e.g. pre-departure orientation which, it had been anticipated, would be shared with other partners as common material was developed. However, a lack of clarity about how public these existing materials and procedures were impacted the extent to which they could be used and further developed in the project, some material needing to be treated as confidential. Equally, for some of the partners, developing and using the common materials seemed less relevant as they already had procedures in place, which were usually both binding and well-documented.

Materials and tools developed during these activities nonetheless give an interesting overview of situations in pre departure countries and can be found at the project website <https://www.cometnetwork.eu/tools>

(cont.)

The COMET project offers beneficiaries a crucial opportunity to receive authentic information about the host country, thereby reducing unrealistic expectations and the risk of cultural shock. This preparatory work ensures effective inclusion and a sustainable integration process.

Building safe and legal pathways for refugees is a humanitarian responsibility that each of us, in our small way, can contribute to fulfilling. Even an idea, an encouragement, or an act of solidarity can be valuable tools in helping those in need reach their dreams...

It's not just about offering an opportunity for a dignified life but promoting and strengthening solidarity and collaboration between communities, institutions, and individuals.

As mediators, our task is to turn this vision into reality: to listen, accompany, and build ever-stronger bridges between peoples and cultures."

(Project partnercultural mediator; himself with migration background)

PREPARING FOR ARRIVALS

A common feature for the “operational” project partners was, despite their different roles and positions, the need to interact with the responsible governmental authorities to set up the corridors and the procedures for departure and arrival of the beneficiaries.

At the point of conceptualising the project, there had been general agreement between governmental authorities and project partners about the operation of existing and new pathways. However, different obstacles were still to be overcome before the pathways could actually operate. These were, on the one hand, of political nature and, on the other, of a practical and, in some cases, a mix of both.

A separate COMET factsheet³ describes how the political context in countries operating complementary pathways or planning them might be changing and thus change the implementation of project plans – to the degree that two of the new pathways planned by COMET partners in the end didn’t go ahead. In other cases, the expected Memoranda of Understanding took considerably longer than expected to be finalised or signed – a problematic aspect not only for the beneficiaries but also for project partners who had deadlines to meet (in contrast with governmental offices which didn’t seem to be under any time pressure).

The political and operational context was also of great importance in the countries of departure. The ongoing civil war and difficult security situation in Libya affected any operation in/from Libya, ultimately resulting in the decision to exclude Libya as a country of departure and instead focus on Niger as a primary departure hub.

However, the coup d’état in Niger in July 2023 and its consequences made some of the departure arrangements extremely uncertain and operationally complex. Identification operations usually undertaken by UNHCR Niger and Intersos could not continue as planned in a volatile security situation. Indeed, it remained unclear until a very late stage if departures from Niger could take place at all, at least to the extent which had been foreseen. This lack of clarity and the resultant delays had a knock-on effect on the operations of several partners, who had made arrangements e.g. for hosting and transport, often involving support groups and partners, and who needed to reschedule repeatedly.

In other cases, the context turned out to be difficult upon arrival. For example, beneficiaries under the French education pathway were not considered as under international protection in France upon arrival. This on the one hand meant their education fees were not lifted as had been hoped. In addition, they even went into a lengthy asylum procedure. In some cases, their (refugee) convention travel documents were not recognised as official ID upon arrival, which made accessing social rights such as housing or social benefits difficult. These points were obstacles with which beneficiaries of a complementary pathway normally should not be confronted and which created an extent of difficulties which had not been foreseen. While some of the beneficiaries have in the meantime been recognised as beneficiaries of international protection, the majority are still awaiting the results of the asylum procedure.

In addition, operational issues added to the difficulties. One planned education pathway required anglophone beneficiaries due to academic reasons – whilst the identified country of departure was francophone. Permission for partners to operate flights or fly over third countries was granted only at the eleventh hour, directly impacting arrangements made for onward travel on arrival. In another instance, the very practical issue that one specific embassy in a country of departure did not have the appropriate machine for taking digital fingerprints took a considerable amount of time to be resolved and, ultimately, resulted in arrivals being postponed for some months.

“It’s been so emotional to receive the families arriving from Niger at the airport, they were tired but happy!”

(Project partner social worker)

Partners responded with flexibility to the issues, but these difficulties highlighted the need for excellent communication between partners at all ends of the pathway.

3 <https://www.cometnetwork.eu/factsheets/>

IDENTIFYING AND INFORMING BENEFICIARIES

The project at a very early stage (March 2022) looked into the question of identifying beneficiaries and matching them with host groups. Aiming at a refugee-centric common methodology, the exchange resulted in a standard checklist and “participant file”, which partners would use as a template when interviewing potential beneficiaries. The specific refugee orientation of the project guided questions on qualifications and a whole section on motivations, aspirations and expectations of the potential beneficiary towards the relocation/pathway process. This, the refugees’ own perspective, is often given little attention in established pathways such as resettlement – which often creates difficulties for the ownership of the pathway by the refugees themselves.

In addition to the checklist and participant file, COMET created space for common reflection and development of common standards on pre-departure orientation for the beneficiaries. Orientation needs were identified, based not only on the aspirations of the beneficiaries, but also on lessons learnt from experiences of previous beneficiaries – what orientation they felt had been useful and what orientation was missing.

One of the central conclusions was that pre-departure orientation would ideally not only be delivered by a person from the host country, but ideally by a person who himself/herself has had a migration/displacement experience to that country. This conclusion was built on the experience that information and suggestions by persons regarded as peers of the beneficiaries would reach the latter much more easily. It was therefore an aim to develop an orientation which would be “comprehensive...” and “multi-dimensional with the aim to “reduce culture shock, manage unrealistic expectations, and prevent frustration and emotional stress”⁴ A socio-cultural mediator formulated the aim that beneficiaries should be able to “start their new lives confidently”.

It was not, however, straightforward to place such persons at the departure location of future beneficiaries, due to resource limitations and security as well as visa issues. This led to Italian project partners developing a suite of podcasts and facilitating video calls between identified beneficiaries and representatives of the relevant partner organisations with a migration/displacement background. Subjects covered included the legal procedures awaiting beneficiaries upon arrival, work and language learning opportunities upon arrival, healthcare and group-specific information – such as an introduction to LGBTQ+ rights for beneficiaries with an LGBTQ+ background.

Podcasts⁵ were made available in 7 languages, covering the languages of countries of arrival and origin. With an average length of between 4½ and 6 minutes, narrators would, supported by visuals, present central information on the specific topic. In the introductory podcast, the narrator pro-actively points out that beneficiaries may have received information about their country of destination which is inaccurate. He encourages listeners to believe in their own strength to meet the changes awaiting them, but also underlines it will at the end of the day depend on themselves and their engagement if this change will work for the better or not. This reflected the intention not only to share information during pre departure orientation but also to empower the beneficiaries on a path towards autonomy.

The thematic podcasts were complemented by interviews with some key actors, e.g. a social worker, imam, themselves with migrant/refugee experience in the country of destination. In the interview they explain something about their lives, reasons for migrating and experiences in the country of arrival – thus rendering the thematic explanations more personal and tangible.

This seems to have worked well and several partners noted that this format allowed for authentic and interactive pre-departure orientation. It has also created a potentially useful model for other projects. It was not, however, without its challenges: the technical conditions were, at times, difficult and, in some cases, the technological skills of the beneficiaries not sufficiently developed to use this resource.

I enjoyed that...I was able to bridge the gap between the countries of departure and destination, ensuring people received correct information and support at the right time

(Cultural mediator involved in developing pre departure orientation).

4 MOSAICO: Social mediation for 360-degree support, p.1

5 See <https://www.cometnetwork.eu/podcasts-and-interviews>

Looking at the experiences of COMET, partners reflected that future podcasts should avoid language which is overly difficult or technical and also not overwhelm beneficiaries with too many details. One respondent underlined the need to let beneficiaries understand that they will not be alone but, rather, accompanied in the country of destination. An evaluation based on interviews with beneficiaries and support workers suggested “adequately balanc[ing] challenges and opportunities” in the podcasts to avoid “unrealistic expectations or fear”.⁶

While the the project intended to include beneficiaries beyond the UNHCR definition, UNHCR Italy, a formal partner, UNHCR Niger, its counterpart, and UNHCR headquarters, among others, played key roles in political negotiations, logistics and in facilitating for practical arrangements. These practical arrangements included things like pre departure orientation as well as arrangements for the departures themselves. The standing and experience of an established UN agency here clearly allowed civil society to move forward at a point where, without UNHCR, civil society organisations might otherwise have had to give up. On the flipside of this, the very detailed and sometimes heavy procedures of UNHCR and the fact that more than one UNHCR office was involved meant that on occasions, some of the project partners could not operate as fast and flexibly as they would have wanted.

GETTING/KEEPING HOSTS ON BOARD

Simultaneously with working on the pre-departure tasks and deliverables, COMET partners looked at motivating future host communities in countries operating pathways. It has to be acknowledged that the precise role of the various host communities involved in COMET differed considerably. Three partners with different profiles organised 5 capacity building modules, which aimed to equip (future) host communities for the task, keeping in mind the profile and wishes of the (future) beneficiaries as well as specific host communities.

All exchange activities were highly valued by the different partners and, as evaluations have shown, helped them to conceptualise and implement their own activities – not least as working results were very precisely documented in minutes as well as short summary guidelines on the respective frameworks being made available to all partners online. There were different perspectives regarding the extent to which tools developed for all the partners and situations were helpful or would need to be specifically adapted for each situation. Some partners who already had developed their own tools were not necessarily as involved in this as those who hadn't.

In several cases, the delays in arrivals made it difficult to mobilise host community groups or for external partners (such as a university in an education pathway) to keep them mobilised. Some of the host community groups or partners over time lost interest or became busy with other projects. Partners also reported the emotional stress which this uncertainty produced not only in the beneficiaries, but also in hosts, particularly those hosting directly.

This was in the case of some host community groups aggravated by the arrival of “alternative beneficiaries” – with millions of displaced Ukrainians arriving in Western Europe and in need of support. Some of the community groups due to host for COMET instead opted to support these very concrete beneficiaries who were already in their location than waiting for the delayed arrival of beneficiaries through a COMET pathway. In other cases, reception capacity normally provided by civil society partner groups was not available as it was taken up by persons displaced from Ukraine.

For several partners depending on processing of cases in Niger, the unclear situation in Niger made planning difficult. Some partners remarked that they felt they could not sufficiently support host communities due to the somewhat unpredictable timing of arrivals as well as limited funding. The changing or unclear departure locations of some of the beneficiaries as well as economic factors like the soaring fuel prices following boycotts of Russian oil products undermined the feasibility of the initial plans.

“The COMET project made it possible to offer protection to people initially excluded from resettlement programmes and other evacuation options, simply because their orientation- or gender-based ground of persecution was not recognised by the country of departure. The fact that, amongst other things, COMET's flexibility and network allowed such an achievement was a great source of pride and inspiration for our work.”

(Staff member involved in the PDO and reception of Italian beneficiaries)

ARRIVAL AND POST-ARRIVAL

Out of the targeted 130 extra arrivals, 121 had taken place by the end of the project. 10 persons came via a university corridor to France, 9 via resettlement supported by community sponsorship to Germany, 5 via an academic pathway for minors to Italy and the remainder via humanitarian corridors to Italy.

At the moment of arrivals, the post-arrival tools and frameworks developed by COMET came into use. Despite this, some problems arose as it emerged that some host groups had not been adequately informed about their beneficiaries' health conditions, such as a pregnancy. In another case, it emerged that beneficiaries were travelling on documents issued by a country of first asylum which carried incorrect information with severe knock-on effects for mainstreaming these beneficiaries into the arrival's country social support systems.

Partners managed to deal with such problems on an *ad hoc* basis but this highlighted how commonly developed frameworks aiming at high quality standards in cases are of little value where rather basic but essential information is not communicated.

Despite this, the possibility to learn or have learnt from organisations with specialised knowledge was seen as a very valuable asset, in particular, where one partner – in contrast to another – might not yet have worked with a specific group of beneficiaries e.g. beneficiaries with an LGBTQI+ profile. In the same way, collaboration with and input from Mosaico, a diaspora organisation was seen as very beneficial.

SHARING THE KNOWLEDGE

Whilst the development of the COMET project and its concrete outcomes in terms of arrivals directly benefited the operational partners, sharing the knowledge and expertise developed within COMET left a legacy beyond the project.

The COMET website <https://www.cometnetwork.eu/> has over time developed from a shop-window introducing the project and announcing it plans to a resource where specialised knowledge developed by the project can be found. In the website's "Lessons Learned" section, central tools such as the frameworks and checklists on pre-departure and post-arrival, and overviews on the status quo in countries of first asylum and host countries can be found. Another section contains detailed reports and guidelines, including in-depth consideration of some of the psychological aspects of implementing complementary pathways. Yet another section contains a series of 10 factsheets which provide an informative but accessible overview of topics ranging from the mechanics of matching between beneficiaries and hosts to the impact of changing political contexts on the establishment and implementation of pathways.⁷

The factsheets are available in all seven of the languages used in the countries of project partners. That these documents have been made available in languages other than English was very much appreciated, as it should help to reach a broader audience in the different countries of project partners.

Three public webinars addressed an audience of both specialists and non-specialists, presenting issues which had been topical in the lifetime of the project. COMET partners decided to focus on two issues which had been/could be problematic in the project. One webinar looked at secondary movement of beneficiaries from the host country to another country and ways of mitigating the problem. Suggestions outlined the importance of good matching e.g. acknowledging the existence of family members in third countries, also underlined the usefulness of peer group support during times of hardship after arriving in the host country. Another webinar looked at the changing political context (see above). While mitigating political factors was beyond the power of the project partners, case studies showed how the planning of the pathways was still useful for refugee protection in other forms. In their feedback, project partners and other participants mentioned these two webinars as examples of how the project was willing to address difficult issues. One respondent mentioned "the positive and open discussions on some critical issues that are usually not addressed".

⁷ See: <https://www.cometnetwork.eu/factsheets/>

A third webinar more looked at the wider context of the potential for growth of complementary pathways. Invited experts explored the steps that can be taken to unlock further growth and overcome obstacles to scaling these initiatives. This webinar was complemented by the report by Migration Policy Institute Europe (MPI Europe) developed in the context of COMET, “Complementary Pathways: Key factors In Future Growth” recommending the creation of a supportive ecosystem to help scale these programmes.

It was critically remarked that the project could have been more proactive in disseminating its findings outside the project events, e.g. at events of other parties on pathways – but there may still be time for that.

WIDER LEARNING

At a project level, the framework of online quarterly encounters (highly structured, limited in time and therefore interactivity) left project partners not engaged on specific themes feeling less involved in a common project or less aware than they would have liked as to where the respective project efforts of other partners were. There was, however, recognition that more regular non-thematic exchanges would have created capacity issues.

Most partners mentioned learning within the partnership and beyond as one of COMET’s central achievements. Several remarked on the benefit of not only looking at “best practice” examples but organising learning by analysing problematic past practice (e.g. secondary movements of pathway beneficiaries) and the lessons learnt from that. The “positive and open discussions” on such critical issues was appreciated.

It was in general felt that the materials (e.g. frameworks on pre-departure and post-arrival) were developed could be useful beyond the lifetime of the project and to non-COMET partners interested in working on/developing pathways.

Several partners expressed the hope that the project could inform policy discussions on pathways but also refugee protection in more general. Two points primary points emerged: on the one hand COMET provides clear evidence that establishing pathways is both feasible and realistic. On the other hand, in order to really work, pathways need more predictable circumstances, be they financial, political or operational.

*“Life is what happens to you while you are busy making other plans”
(John Lennon)*

One aspect which affected almost all partners was that many project activities did not develop as planned, primarily due to external circumstances. As already mentioned under different sections, the beneficiaries, timelines, hosting situation and financial arrangements – to mention a few areas - differed from what had been planned, often quite considerably. Most partners felt that external circumstances changed rapidly, to a degree that they could not fully mitigate the consequences. On the positive side, the project partners were able to develop a spirit of “we are in this together” – as most project partners faced similar challenges. The project thus contributed to the resilience of the pathways and those involved in them.

All partners were willing to be highly flexible in project implementation and to readjust plans. In terms of key deliverables, the project reached 121 out of its target of 130 beneficiaries (93%) and produced a comprehensive archive of material for use beyond the lifetime of the project, not to mention a strong foundation for the establishment of new pathways in the Netherlands and in Spain. However, partners strongly insisted on the need of having a more predictable context of planning and implementing pathways.

FUTURE WISHES/RECOMMENDATIONS

More predictability is indeed one of the future recommendations of the project. While certain aspects cannot be planned, partners in particular asked that the political and organisational framework be more clear and not dependent on *ad hoc* decisions of politicians. One partner formulated this as a need for “Complementary pathways [to be an] integral, permanent part of public policy, which needs to be supported (including financially) by EU”. Partners feel that this has become more necessary as general debates on refugee protection have become more hostile in recent years. Some partners go as far as to suggest that governmental institutions should be obliged to operate according to previously agreed deadlines – just as project partners would.

A second ask is for **realistic budgeting** in the development of complementary pathways. While everyone is aware of the need to use public funds responsibly, several partners felt that the financial framework was too tight and, even with co-financing, did not allow for provision of all necessary services. In addition, the limitations on using EU funding for work on the ground remained a problem. This call therefore centrally goes to national government or other national or regional/local sources.

In the context of upscaling complementary pathways, several partners called for realism regarding the number of beneficiaries of pathways. Partners were aware 130 beneficiaries may from the outside seem very limited in terms of numbers. However, making sure that these 130 beneficiaries could be properly selected, prepared and hosted is hugely demanding terms of both human and financial resources. The actual costs of hosting were not fully met by COMET.

The project itself saw that the strong limitation of travel budget, aggravated by inflation, meant that some organisations had difficulties in financing certain activities for e.g. the final conference. The decision not to have an in-person kick-off meeting due to financial constraints and ecological considerations had some negative impact on the project.

Last not least, COMET very much profited from the diversity of the partners, which helped in so many instances. However, several project partners reflected that this cooperation needs time, patience and a lot of energy. All partners felt that building and maintaining the partnership was well done and thanked FCEI as coordinator. However, many also recommended to be aware that **a partnership doesn't just happen but needs sustained efforts**.

FINAL REMARKS

In analysing what partners felt were the main achievements of the project one can sense pride in having been part of COMET. Asked to explain in one sentence what COMET is, partners mentioned the effective network, the mutual learning and standard setting, and the expertise developed and shared as well as COMET's role in demonstrating that complementary pathways are feasible and replicable.

As mentioned above, partners have appreciated the peer support through the project in challenging moments of the pathways. Praise was also given for the flexibility of the European Commission in taking on board project modifications. However, they ask that political decision makers and governmental institutions provide a predictable framework for future complementary pathways, so that such modifications would be reduced in future projects and pathways.

Finally, it is clear that, thanks to COMET, 121 beneficiaries can have a “fresh start”. **This signifies 121 individuals finding protection through safe passage and not having to climb into a dingy and dangerous boat. For many project partners, this was a, if not THE, central benefit of the project, a benefit which, it is to be hoped, can be replicated and scaled in the years to come.**

This report was prepared by the Churches' Commission for Migrants in Europe (CCME) as part of the Complementary Pathways Network (COMET) project. Its author is Torsten Moritz.

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