

Position Paper: Recommendations for a National AI Strategy

20 May 2026

AmCham Belgium regroups 400 companies, both American businesses operating in Belgium and Belgian companies with a presence in the US. As an independent organization, we do not report to either the Belgian or American governments, nor do we receive any subsidies. This independence allows us to advocate for international businesses with a clear and impartial voice. Our sole commitment is to our companies and to fostering an environment that drives growth, accelerates innovation, and ensures lasting prosperity for both Belgium and the US.

POSITION PAPER

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Introduction

While the EU's Artificial Intelligence Act ("AI Act") provides a foundation of harmonized rules, its success will hinge on practical implementation that supports innovation alongside compliance. As the EU AI Act moves into its implementation phase, Belgium faces a pivotal opportunity to define its position in the global AI economy. The American Chamber of Commerce in Belgium (AmCham Belgium) sets out ten strategic recommendations to enable Belgium to move from compliance to leadership in the European AI economy. These recommendations are informed by AmCham Belgium's members, representing both American companies operating in Belgium and Belgian companies with a presence in the United States, across a broad range of industry sectors.

The recommendations are addressed to all levels of government in Belgium. As a federal state, competences relevant to the above recommendations — including digital infrastructure, education, research, economic development and regulatory oversight — may be shared between the federal government, the Regions and the Communities. Effective implementation will therefore require close coordination and cooperation across all levels of government, building on existing intergovernmental mechanisms.

1. Digital Infrastructure Investment

Digital infrastructure underpins all AI applications, which are essential for both output quality and regulatory compliance. AI systems need massive computational resources, high-speed data transmission, and storage solutions that handle diverse data types while maintaining security and privacy standards. Investment in digital infrastructure is therefore a strategic imperative that determines a nation's capacity to participate in the AI economy.

In terms of public investment, the EU's AI Factories initiative represents a transformative approach to making AI development accessible through facilities with centralized and shared infrastructure. These facilities provide companies across sectors with access to high-performance computing resources, specialized AI development tools, large-scale datasets, and technical expertise that would otherwise require individual investment.

Belgium applied for an EU AI Factory, with an estimated cost of €80 million and an anticipated 50% European subsidy. The application featured interconnected sites at Zellik's Green Energy Park and Cenaero in Charleroi, reflecting cooperation across linguistic regions. Although the application did not secure full EU designation or funding, the EuroHPC Joint Undertaking selected Belgium as one of five pilot "European AI Factory antennas".

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We recommend that Belgium positions its national compute strategy as part of the EU-level ‘AI Factories’ and EuroHPC ecosystem, leveraging EU funding instruments (e.g., Digital Europe and Horizon Europe) while ensuring predictable national co-financing. The aim should be (i) reliable access to compute for Belgian SMEs, scale-ups, research organizations and public-interest projects; and (ii) the build-out of the broader ‘AI compliance infrastructure’ Belgium needs under the EU AI Act (market surveillance capacity, testing expertise, standardization and conformity-assessment readiness). To maintain policy credibility, Belgium’s public communications should clearly distinguish between applications submitted, EU selections made, and secured funding tranches and conditions.

Delivering a credible Belgian AI strategy will require sustained investment in a robust and future proof electricity grid that can support AI-related digital infrastructure while safeguarding sufficient affordable and reliable energy across for all sectors of the Belgian economy. This includes continued reinforcement of the transmission backbone through strategic projects such as Ventilux and the Boucle du Hainaut.

Sensible paths forward focus on approaches that prioritize grid access for projects demonstrating readiness and long-term commitment. Connection frameworks benefit from transparent criteria, defined timelines, and enforceable milestones, ensuring that contracted capacity is reliable and bankable. Appropriate economic signals can help incentivize efficient siting decisions and guide demand toward less congested areas, while readiness-based prioritization enables scarce capacity to be allocated more efficiently. Flexible connection arrangements are an important evolution and are expected to play an increasingly relevant role in the future electricity system. Depending on the nature of the projects, the application may be less evident and therefore deserves specific consideration.

Grid flexibility requirements are shaped by grid operators and national system design, requiring a clear understanding of local needs; TSOs and DSOs should assess, in collaboration with the Belgian governments and Belgian industry, the necessary approach and solutions to address those needs, while enabling projects to collaborate on tailored services and determine which options can be effectively applied in their specific context.

Against that background, while significant private investment in digital infrastructure already exists, Belgium should continue to welcome such investment and ensure that the necessary conditions are in place to support it, including a streamlined and efficient permitting process. The realization of ambitions surrounding digital infrastructure has become increasingly constrained by the complexity and unpredictability of permitting processes. Such delays not only slow the deployment of critical digital infrastructure but also impose significant financial costs on developers and investors due to delay, while undermining Europe's competitiveness in a global race for digital leadership.

Another major barrier is the limited resources and capacity within regional administrations. Many permitting authorities are under-resourced and lack the specialized expertise needed to efficiently process complex applications for digital infrastructure. This results in bottlenecks, delays, and inconsistent decision-making.

In addition, grid capacity constraints and congestion are increasingly affecting both transmission and distribution networks, driven by accelerating electrification, evolving demand profiles, and prolonged connection queues. In many cases, limited capacity is further exacerbated by speculative or inactive connection requests that occupy queue space without progressing to delivery, reducing predictability and delaying viable projects. This reduces system predictability, delays mature and viable projects and ultimately undermines investment certainty.

2. Access to Data

Access to data lies at the very heart of artificial intelligence: both access to high-quality datasets and the free flow of data across sectors and borders are indispensable to develop, train and refine robust AI systems.

In this context, the clarifications introduced in the Digital Omnibus package proposed in November 2025 are particularly significant and could support the effective implementation of Belgium's National AI Strategy. By providing clarifications on the concept of personal data, the use of legitimate interests for AI training and greater legal certainty regarding the processing of sensitive data to detect and mitigate biases, the package contributes to a more predictable legal environment that will support the continued development of the EU's and Belgium's AI ecosystem. It is important that during the negotiations on the Digital Omnibus package, Belgium supports the clarifications included in the Commission's proposal since these contain appropriate and proportionate safeguards that remain aligned with the GDPR and facilitate responsible innovation.

Similarly, the effective implementation of the EU's Data Act could greatly enhance Belgium's AI ecosystem by supporting the creation of data flows and governance frameworks essential for AI development. Therefore, Belgium should implement the EU Data Act in a way that maximizes practical data availability for innovation while protecting trade secrets, preventing cyber incidents and ensuring legal certainty for data holders and data recipients. As the Data Act applies from 12 September 2025, Belgium should prioritize (i) clear designation of competent authorities and points of contact, (ii) practical guidance for businesses (especially SMEs), and (iii) supervisory 'ramp-up' measures focusing first on support, templates, and dispute-resolution readiness.

To this end, the national competent authority should envisage applying early-implementation strategy (warnings, guidance, and targeted and measured action on egregious non-compliance), consistent with the Data Act's requirement for effective, proportionate and dissuasive enforcement. By prioritising guidance, establishing advisory services and building dispute-resolution readiness, regulators can help companies understand obligations and develop practical compliance

strategies. This collaborative, support-focused approach would create ideal conditions for AI innovation by combining improved data access with regulatory clarity.

Finally, while Belgium already maintains a robust national open data portal (data.gov.be), the government should continue to focus on releasing additional public-sector datasets in high-value domains, as Belgium lags behind the EU average according to the 2025 Open Data Maturity Report¹. Publishing government-held data, with the necessary safeguards where relevant, under a clear governance framework would significantly enhance training data accessible to Belgian researchers, start-ups and enterprises.

3. Talent Development and Education

Talent development is the foundation of any successful AI strategy. AI capabilities depend entirely on human expertise across technical, ethical and strategic areas, requiring both training AI specialists and ensuring the broader workforce can work effectively with AI systems. Given Belgium's federal structure, effective AI skills policy requires coordinated action by the Communities (curricula and teacher training), Regions (innovation and labour-market measures), and the Federal level (public procurement, federal workforce upskilling and national coordination). Belgium's national convergence plan already provides a governance basis for this coordination and should be refreshed in light of the AI Act's phased application.

Belgium has a strong educational foundation with several top-ranked universities already offering AI programmes, including KU Leuven's Master of AI and VUB's Bachelor in AI. However, whilst these existing programmes should be expanded, gaps in the broader educational pipeline should also be addressed. This includes supporting the Communities in integrating age-appropriate AI literacy in school curricula (and aligning public-sector workforce training with the AI Act's organizational AI-literacy obligations for deployers and providers), implementing systematic teacher training and developing comprehensive learning initiatives including MOOCs, bootcamps and reskilling programmes for workers in non-tech sectors.

Belgium should also leverage ongoing private sector initiatives and investments in talent development and education. Private companies are indeed making available AI training programmes, digital skills academies and workforce development offerings, often free of charge. The government should actively partner with these efforts, facilitating knowledge transfer and ensuring public educational frameworks complement, rather than duplicate, existing industry-led programs. A good example is the platform of the Flemish AI Academy (VAIA), which bundles a lot of public and privately offered training opportunities.

While respecting the constitutional freedom of education, the governments should establish joint working groups to design multilingual AI programmes for all school levels, coordinate curriculum standards for AI literacy, and pool resources and expertise. It should ensure AI tools work smoothly

¹ [2025 odm factsheets.pdf](#)

in Belgium's three official languages and introduce joint procurement of AI educational technologies to reduce costs and achieve economies of scale. This approach can transform Belgium's multilingual environment from a potential hurdle into an educational asset.

Lastly, Belgium should recognize AI literacy as a foundational skill for both education and workforce systems, ensuring that learners and workers are equipped to use AI safely, effectively, and responsibly. In this context, the upcoming EU-OECD AI Literacy Framework for primary and secondary education (expected in June 2026) provides a timely and credible reference point for policymakers. Belgium should build on this framework to guide the integration of AI literacy into curricula, teacher training, and lifelong learning systems, while ensuring alignment with broader workforce upskilling efforts.

4. Research Investment

Directly related to the previous point, investing in AI research and development is crucial for long-term economic competitiveness, as breakthrough innovations typically come from sustained, high-quality research. Countries that establish strong AI research capabilities generate intellectual property, attract international talent and develop the deep expertise necessary to effectively regulate and deploy AI. Belgium is well positioned to produce success in AI, following the example of the IT innovation hubs in Brussels, Antwerp, Charleroi, Mons and Ghent.

Belgium should implement a comprehensive AI research investment strategy, featuring targeted funding programmes for both fundamental research and applied projects. This strategy should prioritize sectors where Belgium holds competitive advantages, such as healthcare/biotech, financial services, defence and logistics.

Drawing inspiration from France's successful model, Belgium should reduce administrative burdens for public research institutions, enhance remuneration packages to attract and retain world-class AI talent and significantly increase investment in AI-specialized research centres across the country's universities. These research centers, in turn, should receive government support to spin their innovations into start-ups, a model that has demonstrated strong results in Belgium before.

To foster academic-industry collaboration, Belgium should implement tax incentives and grant schemes to support joint research initiatives and industrial PhD programmes. Additionally, expanding financial support for AI doctoral scholarships is essential to strengthen the national talent pipeline and maximize the country's AI research potential.

Belgium should provide legal certainty for AI R&D and testing by issuing national guidance that operationalizes the AI Act's scope and innovation provisions (including the 'scientific research and development' scope carve-out and the regulatory sandbox framework), while clarifying how GDPR requirements (lawful basis, transparency, security, DPIA where relevant) apply in research settings.

Building on these domestic efforts, Belgium can further benefit from prioritising public-private partnership projects, drawing from Luxembourg's successful model. These partnerships should combine government research funding with private sector expertise and commercial applications, leveraging Belgium's strong university-industry collaboration traditions particularly through institutions like imec and established networks between KU Leuven (KUL), Vrije Universiteit Brussel (VUB), Université libre de Bruxelles (ULB) and other leading universities. Additionally, Belgium could establish cross-border research partnerships within the Benelux framework and with French research institutions, creating economies of scale that enable smaller European nations to better compete with larger AI research programmes.

5. Regulatory Framework and Governance

Effective AI governance requires balancing innovation with fundamental rights protection, creating regulatory frameworks that provide business certainty while ensuring responsible AI development and deployment.

Belgium should support the principles of the Commission's proposal for an AI Omnibus, as it proposes adapted timelines for implementing the EU AI Act. The proposal introduces a "stop-the-clock" that defers certain high-risk AI obligations from August 2026 until support measures such as harmonized standards, guidelines and common specifications are available, with application dates some time after the Commission confirms their availability.

Belgium should endorse this revised timeline, while acknowledging that industry should be involved in the practical guidance that will specify practical conformity requirements. Effective regulation requires practical guidance so that organizations understand and can meet their obligations consistently. Premature enforcement without adequate support mechanisms risks undermining innovation and competitiveness, particularly for European manufacturers and industrial software developers facing complex requirements for high-risk AI systems.

Article 57 of the AI Act obliges EU Member States to set up at least one national AI regulatory sandbox, operational by August 2, 2026. Belgium should prioritize establishing such a sandbox that enables businesses, research institutions and public authorities to test AI systems in a supervised, collaborative setting, even though they are only part of the solution and need to go hand-in-hand with a well-designed, workable legal framework. Belgium's AI regulatory sandbox should be designed as a supervised 'learning-by-doing' mechanism that provides structured guidance, predictable timelines, and a clear compliance pathway – without implying derogations from directly applicable EU legal requirements. The sandbox should focus on: (i) early risk classification and role-mapping (provider/deployer/supply chain), (ii) documentation and testing protocols aligned with AI Act obligations, (iii) coordination with GDPR supervision where personal data is processed and (iv) feedback loops into national guidance and public-procurement templates. This is essential to help SMEs and start-ups adopt AI responsibly.

Given Belgium's federal structure and the involvement of multiple regulators, establishing a central authority for AI governance would address several critical challenges simultaneously. This authority could serve two functions: (i) coordinating sandbox operations, and (ii) providing a one-stop-shop for guidance and support.

5.1 Sandbox

For sandbox management, this central authority would ensure uniform procedures, effective communication, and regulatory consistency. Such coordination should identify the various regulators involved and encourage the Belgian government to enact supportive national implementation measures that clarify procedures, competent contacts, and safe testing process under the AI Act's sandbox framework, including clear rules for real-world testing governance, incident handling, and cooperation with competent authorities. Belgium should urgently provide institutional clarity by designating the competent authorities and its single point of contact under the AI Act.

5.2 One-stop-shop

Finally, this central authority should act as a one-stop shop for all AI-related support, allowing businesses to seek advice without splitting enquiries across distinct regulatory bodies such as data protection, financial services, healthcare or mobility, which increases the risk of siloed thinking and potentially conflicting advice. This one-stop shop could operate through two channels: one dedicated to legal compliance and sandbox procedures; the other directing participants to support and resources available across the Belgian AI ecosystem.

6. International Cooperation

International collaboration in AI has become essential as these technologies cross national boundaries and require coordinated approaches to standards, ethics and security. Countries that actively participate in shaping global AI norms gain advantages in market access, technology transfer, and influence overall future regulatory developments. Collaboration also enables smaller EU Member States such as Belgium to access resources, expertise and markets that would be difficult to develop independently, while contributing their own unique strengths to global AI advancement.

Belgium's strategic geographic position and established diplomatic networks provide exceptional opportunities to leverage existing international cooperation frameworks. The Belgian government should prioritize expanding AI-focused initiatives within the Benelux and pan-European framework, establishing formal cooperation agreements that pool resources, expertise and infrastructure investments. This trilateral approach could involve the joint development of AI standards, joint regulatory sandboxes, convergence on documentation templates and coordinated AI Act

implementation, thereby reducing fragmentation and improving legal certainty for companies operating across the region and third-country providers. Such cooperation would also maximize the collective bargaining power of smaller European nations in global AI governance discussions.

In addition, the Benelux region occupies a pivotal role in the global AI value chain through its semiconductor ecosystem. The Netherlands hosts ASML, the world's leading manufacturer of extreme ultraviolet lithography machines essential for advanced AI chips, while Belgium is home to imec, a leading semiconductor research hub that recently secured EUR 700 million in EU Chips Act funding. This concentration of technological leadership creates a strategic opportunity for Belgium to strengthen its position in AI governance. Belgium should explicitly integrate this semiconductor ecosystem into its international AI cooperation strategy, particularly within Benelux frameworks.

Finally, Belgium's AI strategy should prioritize open and competitive markets that enable access to best-in-class technologies from global partners. As the EU considers new industrial policy measures, including potential local-content requirements, Belgium should advocate approaches that reward genuine added value rather than origin-based criteria, which risk market fragmentation, cyber vulnerabilities, reduction in quality and higher costs.

7. Digital Sovereignty and Trusted AI

As Belgium advances its national AI strategy, it should adopt a pragmatic and innovation-oriented approach to digital sovereignty through trust and safeguards. Digital sovereignty refers to the ability of governments and organizations to operate securely and independently in the digital economy, while maintaining full control over their data, infrastructure, and operations. Rather than implying isolation, it is about exercising autonomous governance within a globally interconnected digital ecosystem. Particular attention should be paid to ensuring the resilience and security of digital systems that underpin critical infrastructure.

Belgium should therefore prioritize policies that promote trusted AI adoption, robust cybersecurity standards, and contractual and technical safeguards—enabling organizations to choose where and how their data is processed while benefiting from best-in-class AI solutions. Balanced policies, including through public procurement, that combine openness, innovation and trust will allow Belgium to fully benefit from global AI value chains, attract investment, and accelerate AI adoption, while upholding European values and increasing its digital sovereignty.

8. Focused Efforts

If resource constraints mean that the competent authorities cannot effectively oversee AI deployment across all sectors simultaneously, concentrating expertise on priority areas may become essential for effective governance and resource allocation. Belgium should therefore consider adopting a strategy involving risk-based, sector-focused approaches that concentrate

initial AI investments and regulatory attention on areas where the country possesses existing competitive advantages and critical national interests.

For example, the pharmaceutical, biotechnology, space and defence sectors could be given priority to leverage Belgium's world-renowned expertise and infrastructure. In addition, logistics represents another natural focus area, capitalising on Belgium's position as a key logistics hub-anchored by the major port of Antwerp-Bruges.

9. Digitalization of the public sector

Similarly, Belgium's advanced digitalization can provide a head start compared to other EU member states. The country has indeed made investments in digital government services and citizen-facing digital infrastructure (e.g. the electronic ID cards and the digital wallet, MyGov.be, itsme and the digital health records) that creates an ideal foundation for AI integration and deployment.

Belgium should leverage its digital government services to improve service delivery through carefully scoped AI deployments, using privacy-preserving data strategies and legally robust data governance. Where public data is used to develop or validate AI systems, Belgium should ensure a clear legal basis under GDPR, maintain purpose limitation and data minimization, and adopt security and human oversight measures appropriate to the use case. This could include intelligent chatbots that guide citizens through complex administrative processes and predictive analytics that optimize public service delivery. Public-sector AI adoption should be framed as 'trusted AI' delivery – transparent to citizens, auditable by design, and aligned with Belgium's existing national objective to promote trustworthy AI.

10. Prioritize AI Adoption to Unlock Economic Growth

Belgium's national AI strategy should place a strong and explicit focus on accelerating AI adoption across the economy, as widespread deployment—not only frontier research—will determine near term productivity gains and competitiveness. While Belgium benefits from a strong research base and innovative SMEs, too many organizations, particularly small and mid-sized enterprises and public administrations, struggle to translate AI potential into operational impact. Targeted policies should therefore lower adoption barriers by expanding access to digital infrastructure, supporting sector specific use cases, and scaling practical AI skilling and change management programmes. By fostering demand side adoption in key Belgian strengths such as healthcare, logistics, manufacturing and professional services, Belgium can rapidly boost productivity, enable new business models and ensure that AI contributes directly to sustainable economic growth.

About AmCham Belgium

Founded in 1948, the American Chamber of Commerce in Belgium (AmCham Belgium) is a dynamic non-profit organization dedicated to improving business and investment opportunities for the US-Belgian business community. Supported by around 400 member companies, AmCham Belgium plays a pivotal role in an evolving business environment by focusing on three key areas: advocacy, networking and knowledge-sharing. To learn more about AmCham Belgium, visit www.amcham.be

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