

# **FEEDBACK BY THE MALTA CHAMBER**

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## **WHERE INNOVATION MEETS TRUST FOR WELL-BEING**

**Presented to :** MDIA

**Date :** 12/02/2026



## 1. General Assessment

The Malta Chamber broadly considers the Updated National AI Strategy by MDIA to be sound and forward-looking. The strategy is aligned with EU and international frameworks, positioning Malta strongly among small states in ethical, human-centric and trustworthy AI.

The Malta Chamber's most salient concerns focus primarily on **execution, delivery and practical impact**, rather than on the strategic vision itself.

## 2. Execution, Funding and Governance

Reacting to our outreach for feedback, The Malta Chamber members identified execution risk as the principal challenge. There is limited transparency on **budget allocations, funding envelopes and phasing** across the proposed measures. In this context, The Malta Chamber demands clearer **Measure-ownership, accountability and timelines** for delivery, recommending the introduction of **early monitoring mechanisms**, such as a public implementation dashboard, to reinforce credibility and momentum.

The importance of **improved coordination across government entities, agencies and other stakeholders** cannot be emphasised enough. This remains a critical enabler for effective implementation of the Updated AI Strategy. Without clear alignment, there is a risk of overlapping initiatives, fragmented efforts and inefficient use of our very restrained resources. The Malta Chamber notes that a **more structured coordination mechanism** would help ensure complementarity between measures, reduce duplication of existing programmes and provide businesses with a clearer and more coherent support landscape.

Clear **KPIs** would need to be consequently established, particularly in relation to **training and funding measures**. These KPIs need to move **beyond activity-based metrics** and instead capture **tangible business outcomes**. Success should not be measured by the number of courses delivered or participants trained but by the extent to which these interventions translate into measurable improvements, such as enhanced job mobility, productivity gains, operational efficiencies, or the adoption of improved business operating models.

KPIs should therefore **reflect both direct and indirect value creation for enterprises**, ensuring that public investment is demonstrably linked to real economic and organisational impact.

The Malta Chamber also supports practical collaboration mechanisms. This can be done mainly through:

- Facilitation of **public-private pilot projects**, enabling direct collaboration with ministries, regulators and sector bodies.
- Regulatory sandboxes, serving as **active pipelines to deployment**, not solely as compliance frameworks.

To strengthen governance and delivery, The Malta Chamber also recommends that the adoption and implementation of the Malta AI Strategy should be **reviewed at six-month intervals rather than**

**relying solely on annual assessments.** More frequent checkpoints would enable faster feedback loops, pinpoint implementation challenges and avoid a timely course correction.

This approach would support a more **agile, responsive and outcome-oriented implementation framework**, better aligned with the pace of technological change and business needs.

### 3. SME Adoption and Business practicality

While the strategy acknowledges SME support, Malta Chamber members consider the **current provisions insufficiently targeted**. Sector-specific instruments should be established to support AI adoption in operational areas such as finance, supply chains, manufacturing and public services.

Secondly, **practical incentives** should focus on AI-driven automation, including RPA, predictive analytics and applied business AI tools, going beyond awareness-raising or high-level guidance.

Thirdly, KPIs should explicitly measure the extent to which newly acquired AI skills are applied in the workplace. This ensures alignment with the AI Strategy's goal of **driving real adoption rather than theoretical upskilling**, capturing tangible outcomes such as the deployment of AI tools, process automation, or data-driven decision-making and provide **a more accurate reflection of the strategy's impact on business transformation**.

### 4. EU AI Act Compliance clarity

Businesses developing or integrating AI systems require clearer operational guidance since our members request **practical, accessible guidance** on compliance obligations under the EU AI Act. Navigating complex regulations with unclear regulatory foresights is very challenging.

Early clarity is therefore essential to avoid regulatory uncertainty becoming a deterrent to AI investment and deployment.

### 5. Data Infrastructure and enabling foundations

The strategy's success is seen as highly dependent on enabling infrastructure.

The Malta Chamber notes heavy reliance on **data availability, open data initiatives and supercomputing capacity**, representing a material delivery risk. Delays in these enablers would undermine multiple pillars of the strategy.

Members also call for **accelerated, transparent rollout** of these foundational elements.

### 6. Skills, workforce and jobs impact

Our members place strong emphasis on **workforce preparedness as a critical enabler of AI adoption**. The provision of free AI application subscriptions following training was welcomed as a positive support measure. Adding to that, it was suggested that **anonymised usage data from these subscriptions be systematically analysed to understand how tools are being used in practice**, the types of use cases being adopted and where users encounter barriers.

This insight would be invaluable for **refining training content**, identifying skills gaps, and tailoring future policy interventions to actual user behaviour rather than assumed uptake.

Based on discussions held prior to compiling this feedback, the following observations and recommendations were also shared:

- **Embed AI literacy in early education** through practical, critical-thinking focused content accessible to all students.
- **Conduct a national AI jobs impact study** to assess displacement risks, emerging roles, and future skills requirements.
- **Ensure the National Skills Council co-leads this work** to align findings with broader workforce planning.
- Develop a **coordinated national AI skills strategy**, fully integrated with the forthcoming National Skills Strategy.
- **Expand reskilling and upskilling programmes**, prioritising workers most exposed to AI-driven change, informed by data-driven assessments.
- **Targeted scholarships**, specialised **work visas** and expanded computing and teaching capacity at **UM and MCAST**.

The Malta Chamber notes with concern that significant persistent shortages remain in applied AI skills. There are key gaps identified in **applied AI, data integration and automation engineering**. Without a more concrete focused intervention, Malta's scale and resource constraints risk limiting competitiveness.

## 7. Sectoral Opportunities and Productivity Focus

The Malta Chamber members stress that AI should be positioned explicitly as a **productivity and competitiveness driver**, particularly in addressing labour shortages, particularly in the following sectors:

- **Tourism:** AI should enhance quality, personalisation and efficiency while safeguarding cultural authenticity. The Malta Tourism Observatory should assess impacts.
- **Energy, maritime, logistics and robotics:** Identified as **first-mover opportunity areas** through applied, end-to-end trials.

## 8. AI Assurance and International positioning

The Malta Chamber members also see potential for Malta to develop a competitive niche in **AI assurance**, whereby...

- Focus would be on **real-world deployment in regulated sectors**, rather than purely compliance-led positioning.
- Competitive advantage would depend on **fast, predictable and technically credible assurance frameworks**.
- International rankings should prompt **targeted execution and delivery**, with initiatives that produce visible results within months, not years.

## 9. Conclusion

From a Malta Chamber's perspective, the strategy is well designed and aligned with international best practice. The priority now shifts to **delivery** with the following components bearing elevated importance (a) clearer funding instruments, (b) outcome-focused KPIs, (c) accelerated data infrastructure and (d) stronger skills depth.

With these adjustments, our members believe that Malta can **build on a strong standpoint and strengthen its leadership** in trustworthy, human-centric AI.



# THE MALTA CHAMBER

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