



Labour Migration in Times of Labour Shortages **in Belgium**



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FOREWORD

This publication is based on EMN Belgium's contribution to the comparative EMN study "Labour migration in times of labour shortages".¹ This publication was prepared by Pauline Chomel, Wout Van Doren, Manuela Birsan (Fragomen Belgium) and Elisabeth Kamm, Andreia Ghimis, Jo Antoons (Fragomen Consulting Europe), under the coordination of the Belgian National Contact Point to the EMN (EMN Belgium)².

The information provided in this publication is based on desk research complemented by input from key stakeholders in the field of labour migration in Belgium. Contributions were received from the Immigration Office, the Economic Migration Services in the Brussels Region, the Flemish Region, the Walloon Region as well as the German-speaking Community; the regional public employment services VDAB, Le Forem and Actiris; the employer organisations VOKA, VBO, AKT; sectorial organisations Agoria, Steebel – GVS, FEBETRA; trade union ACV CSC and Dries Lens from the University of Antwerp and Amy Weatherburn from KU Leuven. All input was received in November 2024 and later updated in December 2025 where relevant. Their insights were invaluable in providing a detailed overview of labour migration in Belgium.

(1) European Migration Network (EMN) – OECD, 'Labour Migration in times of labour shortages', December 2025, <https://emnbelgium.be/publication/labour-migration-time-labour-shortages>, last accessed on 26 January 2026.

(2) www.emnbelgium.be.

DEFINITIONS

Unless otherwise specified, the definitions are taken from the EMN Asylum and Migration Glossary, version 10.0.³

- ▶ **Employment:** The exercise of activities covering whatever form of labour or work regulated under national law or in accordance with established practice for or under the direction and/or supervision of an employer.
- ▶ **Labour market test:** Mechanism that aims to ensure that migrant workers are only admitted after employers have unsuccessfully searched for national workers, EU citizens (in EU Member States, this also means European Economic Area (EEA) workers) or legally residing third-country nationals with access to the labour market according to national legislation.
- ▶ **Labour migration:** Movement of persons from one state to another or within their own country of residence, for the purpose of employment.
- ▶ **Labour shortage:** Shortage of a particular type of labour in a particular labour market, which may be said to exist when the number of vacancies has been (or is expected to be) above a level considered to represent 'normal' turnover at the prevailing wages and working conditions for an extended period.
- ▶ **Legal pathway:** In the EU context, all legal mechanisms and policies that enable lawful migration from a third country to an EU Member State, for both international and humanitarian protection needs and labour market needs.
- ▶ **Mobility partnership:** A cooperation arrangement based on political declarations, which provides a bilateral framework for dialogue and practical cooperation on a voluntary basis to address migration and mobility issues of mutual concern, primarily with EU neighbourhood countries, including short and long-term mobility.
- ▶ **Regional labour market imbalances:** Regional differences of labour demand and supply within a country.⁴
- ▶ **Shortage occupations:** According to the European Labour Authority (ELA), occupations for which employers face a shortage of suitable employees (i.e. the demand for workers with required skills at a specific location is greater than the supply). The ELA further differentiates between 'severe shortage' and 'widespread shortage'.⁵

(3) European Commission, 'EMN Asylum and Migration Glossary', https://home-affairs.ec.europa.eu/networks/europeanmigration-network-emn/emn-asylum-and-migration-glossary_en, last accessed on 11 December 2025.

(4) European Labour Authority, 'EURES Report on Labour Shortages and Surpluses 2022', 2022, <https://www.ela.europa.eu/sites/default/files/2023-09/ELA-eures-shortages-surpluses-report-2022.pdf>, p. 44, last accessed 26 January 2026.

(5) Ibid., p. 8.

- ▶ **Talent Partnerships:** Talent Partnerships are part of the comprehensive partnerships between the EU and partner countries and migration management introduced by the Pact on Migration and Asylum. They aim to boost mutually beneficial skills development and international mobility, based on better matching of labour market needs and skills between the EU and partner countries, and are open to all skill levels.
- ▶ **Third-country national:** Any person who is not a citizen of the EU within the meaning of Article 20(1) of the Treaty on the Functioning of the European Union (TFEU), and who is not a person enjoying the EU right to free movement, as defined in Article 2(5) of the Regulation (EU) 2016/399 (Schengen Borders Code).

EXECUTIVE SUMMARY

Belgium faces persistent labour shortages across multiple sectors, ranking among the top three EU Member States for job vacancy rates between 2021 and 2024. Regional disparities are pronounced: the Flemish Region shows high employment and low unemployment, whereas the Brussels-Capital Region and the Walloon Region record lower labour market participation, higher levels of unused workforce potential with limited interregional mobility. Vacancy rates are elevated (4.2% in Q4 2024), particularly in administrative support, professional services, ICT, and hospitality.

Between 2021 and 2025, labour migration as a response to shortages has been debated at both federal and regional levels. Following these discussions, several reforms clarified the legal frameworks for work-authorisations for shortage occupations and based on the labour market test: Brussels adopted its first comprehensive ordinance on economic migration in 2024; Flanders refined its concentric model for labour migration and fast-track procedures for highly skilled workers; and Wallonia further clarified permit categories and labour market test procedure.

Each region applies distinct conditions for attracting international talent. Both Flanders and Wallonia aim to make highly skilled permits more accessible to young professionals, with Wallonia additionally recognising relevant work experience as an alternative to a formal diploma. Brussels maintains a diploma requirement and a monthly salary benchmark, and the German-speaking Community sets separate thresholds for temporary versus permanent employment. For low/medium skilled professionals, the same permits are available across the regions - shortage occupation lists and labour market test permits - with variations in vacancy publication periods, qualification checks, and employer obligations. Flanders further differentiates itself by excluding low skilled occupations from labour migration pathways. EU-level initiatives, including Skills Mobility Partnerships and pilot projects with North African and Sub-Saharan countries, complement national efforts.

Key challenges in leveraging labour migration to address shortages include fragmented governance, lengthy permit processing times, complex qualification recognition, limited job-to-job mobility for permit holders, and insufficient settlement support. Good practices observed include digitalisation of procedures, lowered salary thresholds for young professionals, multilingual recruitment campaigns, and enhanced training-to-employment pathways for residents.

INTRODUCTION

Belgium experiences labour shortages across several sectors and regions, prompting increased attention to the role of labour migration as one of several responses. This national report follows the publication of the EMN comparative study “Labour Migration in times of Labour Shortages”⁶ and examines how Belgium has used labour migration laws, policies and practices to respond to labour market needs. The report covers:

- ▶ national and regional trends in labour shortages and inflows of third-country workers;
- ▶ developments in legislation and policy between January 2021 and June 2024, with selected updates through 2025;
- ▶ instruments used to attract, recruit and retain foreign workers;
- ▶ bilateral and multilateral labour mobility initiatives;
- ▶ challenges, lessons learned and good practices identified by authorities and stakeholders.

The temporal and analytical scope follows the EMN study parameters, although relevant 2025 updates were included, and focuses on third-country nationals entering Belgium for employment purposes. The analysis does not cover posting of workers, international students, self-employment, or persons already residing in Belgium.

(6) European Migration Network (EMN) – OECD, ‘Labour Migration in times of labour shortages’, loc. cit.

01 OVERVIEW OF LABOUR SHORTAGES IN BELGIUM



Belgium's labour market shows varying levels of labour demand across sectors and regions, with some areas experiencing higher vacancy rates and differing participation patterns. This section provides an overview of the sectors where shortages are most visible ([1.1](#)) and outlines key regional labour market indicators that help contextualise these differences ([1.2](#)). Together, these elements offer a snapshot of the labour market dynamics shaping current recruitment needs.

1.1. SECTORS MOST AFFECTED

Belgium consistently ranked among the top three EU Members States with the highest job vacancy rates according to job vacancy data from January 2021 to March 2024.⁷

The sectors with the highest vacancy rates during this period include:



- ▶ **Administrative and support service activities** (average vacancy rate: 9.14%)



- ▶ **Professional, scientific and technical activities** (7.78%)



- ▶ **Information and communication activities** (7.69%)



- ▶ **Accommodation and food service activities** (6.97%).⁸
-

(7) Eurostat, 'Job vacancy rate by Member States', <https://ec.europa.eu/eurostat/web/products-euro-indicators/w/3-16122025-bp#estat-inpage-nav-heading-1>, data extracted in September 2024.

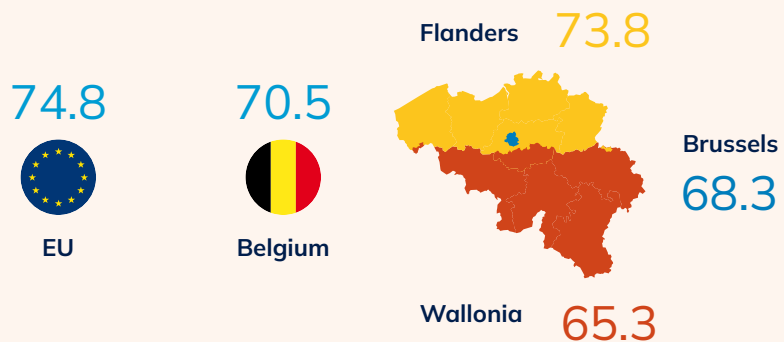
(8) ICF, 'Job vacancy statistics by NACE Rev. 2 activity - quarterly data', 2021 – 2024, last accessed on 14 December 2025.

1.2. REGIONAL IMBALANCES

The following indicators illustrate key differences in labour market conditions across Belgium's regions⁹ and help to contextualise where shortages are most likely to occur.

- ▶ **Labour force participation rate.**¹⁰ In 2023, the labour force participation rate in Belgium stood at 70.5%, about 4 percentage points (pp) below the EU average. Participation varies across demographic groups and regions: it is lower among low-skilled, third-country nationals, young people and seniors. Regionally, participation reached 73.8% in Flanders, compared with 68.3% in Brussels and 65.3% in Wallonia.

Participation rate, 2023



Note: Participation varies across demographic groups and regions: it is lower among low-skilled, third-country nationals, young people and seniors. No data found for the German-speaking Community.

Source: Conseil supérieur de l'emploi, 2024
https://cse.belgique.be/sites/default/files/content/download/files/202407_cse_etat_des_lieux_du_marche_du_travail_0.pdf

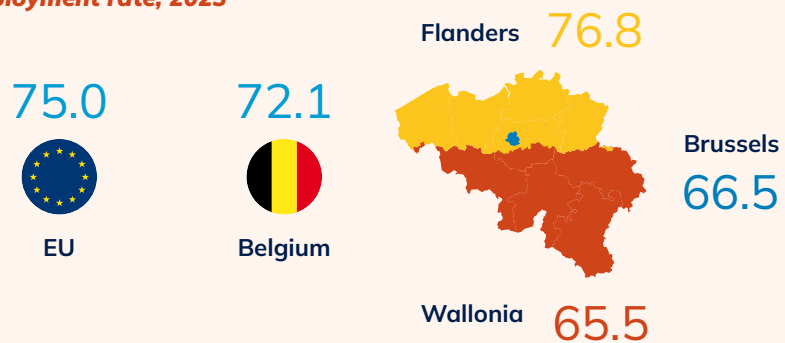
(9) For ease of reading, the terms "Flanders" and "Flemish Region" are used interchangeably throughout this document and refer to the same regional entity. Similarly, "Brussels" and "Brussels-Capital Region" are used interchangeably, as are "Wallonia" and "Walloon Region". In all cases, these terms denote the same respective region within Belgium.

(10) Conseil supérieur de l'emploi, 'État des lieux du marché du travail en Belgique et dans les régions', July 2024, https://cse.belgique.be/sites/default/files/content/download/files/202407_cse_etat_des_lieux_du_marche_du_travail_0.pdf, p. 8, last accessed on 12 November 2025.

This indicator measures the share of the working-age population that is either employed or actively seeking employment, reflecting the extent to which people are available to the labour market. No available data for the German-speaking Community.

- **Employment rate.**¹¹ Among people aged 20–64, the employment rate in Belgium was 72.1% in 2023. Regional differences persist, with 76.8% in Flanders, 66.5% in Brussels and 65.5% in Wallonia. Long-term trends also diverge. Since 2000, Wallonia’s employment rate increased by 3.5 pp, compared with 7.1 pp in Flanders and 7 pp in Brussels.

Employment rate, 2023



Note: no data found for the German-speaking Community.

Source: Conseil supérieur de l'emploi, 2024

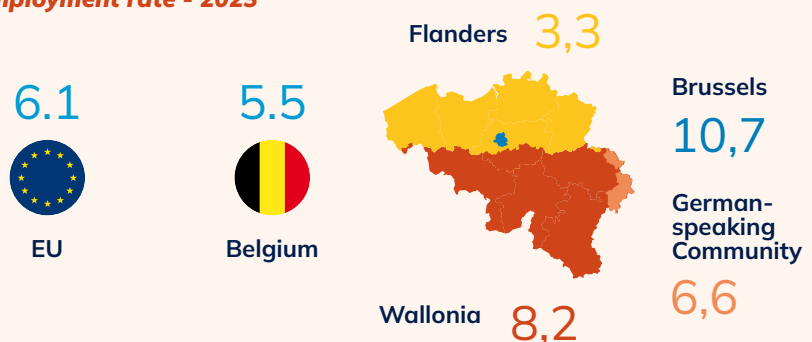
https://cse.belgique.be/sites/default/files/content/download/files/202407_cse_etat_des_lieux_du_marche_du_travail_0.pdf

Eurostat, 2024

[https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20240425-1#:~:text=In%202023%2C%20more%20than%2075%25%20\(195.7%20million\),in%202020%20due%20to%20the%20COVID%2D19%20pandemic](https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20240425-1#:~:text=In%202023%2C%20more%20than%2075%25%20(195.7%20million),in%202020%20due%20to%20the%20COVID%2D19%20pandemic)

- **Unemployment rates.**¹² Unemployment levels vary substantially between regions. In 2023, unemployment stood at 3.3% in Flanders, 8.2% in Wallonia, 10.7% in Brussels and 6.6% in the German-speaking Community.

Unemployment rate - 2023



Source: Conseil supérieur de l'emploi, 2024

https://cse.belgique.be/sites/default/files/content/download/files/202407_cse_etat_des_lieux_du_marche_du_travail_0.pdf

Eurostat, 2024

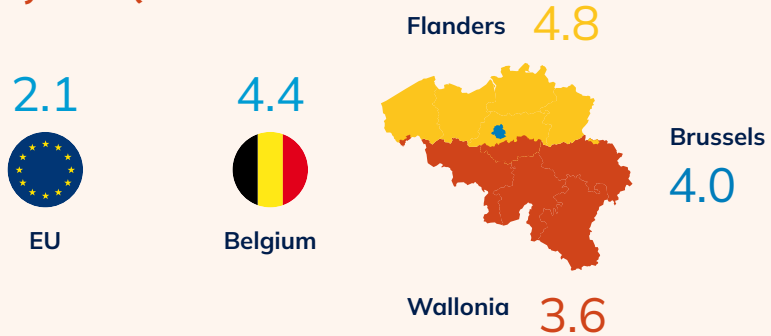
https://ec.europa.eu/eurostat/databrowser/view/tps00203/default/table?lang=en&category=t_labour.t_employ.t_lfsi.t_une

(11) Ibid., p. 9. This indicator measures the share of people aged 20 to 64 who are in paid employment. No available data for the German-speaking Community.

(12) Ibid., p. 10. This indicator captures the proportion of the labour force that is not employed but actively seeking work.

- ▶ **Vacancy rate.** At the same time, **job vacancies** remain high. In Q1 2024, the national vacancy rate was 4.4%, with Flanders at 4.8%, Brussels at 4.0% and Wallonia at 3.6%.¹³

Vacancy rate - Q1 2024

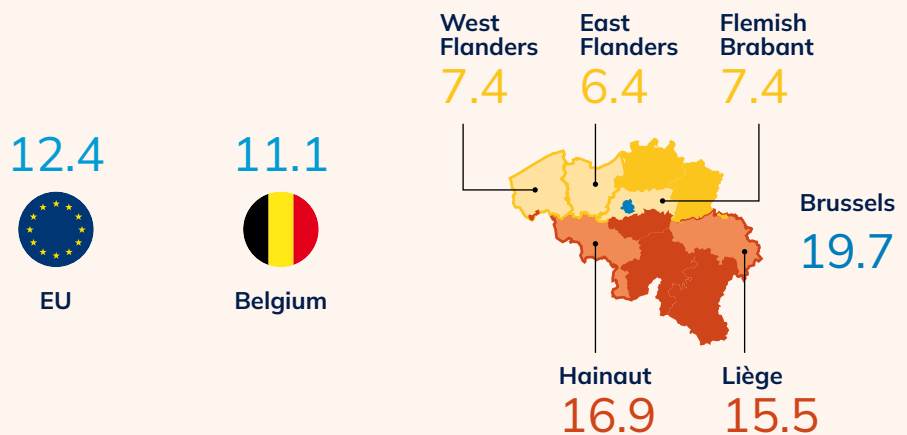


Note: no data found for the German-speaking Community.

Source: Conseil supérieur de l'emploi, 2024
https://cse.belgique.be/sites/default/files/content/download/files/202407_cse_etat_des_lieux_du_marche_du_travail_0.pdf
 Eurostat, 2026
https://ec.europa.eu/eurostat/databrowser/view/tps00203/default/table?lang=en&category=t_labour.t_employ.t_lfs.it_une

- ▶ **Labour market slack.** The share of people with an unmet need for employment is overall relatively low in Belgium (11.1% in 2022). Slack was between 5% and 7% in West Flanders, East Flanders and Flemish Brabant. It was markedly higher in Hainaut (15%), Liège (16%) and Brussels (19%).¹⁴

Labour Market Slack - 2022



Source: Eurostat, 2026
https://ec.europa.eu/eurostat/databrowser/view/lfst_r_sla_ga_custom_20101762/default/table

(13) Eurostat, 'Third quarter 2024 Euro area job vacancy rate at 2.5%', <https://ec.europa.eu/eurostat/web/products-euro-indicators/w/3-16122024-bp>, last accessed on 26 November 2025. No available data for the German-speaking Community.

(14) Conseil supérieur de l'emploi, op. cit., p. 71. No available data for the German-speaking Community.

- ▶ **Interregional mobility.** Despite the moderate size of the country and the marked regional differences, mobility between different regions remains limited. In 2022, around 3% of residents from Walloon provinces commuted to Flanders for work, compared with 11% of Brussels residents, mainly to Flemish Brabant.¹⁵

The coexistence of high vacancy rates, uneven participation, and varying levels of unused labour potential across regions illustrates the complexity of Belgium's labour market. These dynamics continue to shape public debate and inform policy responses aimed at addressing persistent shortages.

(15) Ibid., No available data for the German-speaking Community.

02 LABOUR SHORTAGES IN THE PUBLIC DEBATE AND POLICY RESPONSES



Labour shortages and labour migration in Belgium have been important topics in public discussions, reflecting demographic developments, employer concerns and policy priorities. These debates unfold within a complex governance architecture that allocates responsibilities across federal, regional, and community levels, shaping both the design and implementation of relevant measures (2.1). This section provides an overview of how stakeholders have engaged with the issue of labour shortages (2.2) and how these discussions have informed recent reforms (2.3).

2.1 GOVERNANCE FRAMEWORK

The country's institutional structure, with competences distributed across the federal state, the three regions, and the communities, shapes how labour market and labour migration instruments are designed, implemented, and coordinated.

The country's federal architecture is composed of:

- ▶ the **federal state**,
- ▶ **three regions** (the Brussels-Capital Region, the Flemish Region, and the Walloon Region), and,
- ▶ **three communities** (Flemish, French, and German-speaking).¹⁶

Each of these entities holds distinct competences related to **labour market policy**:

- ▶ The **federal state** is responsible for labour law and social security, and it retains residual competence for all matters that are not explicitly transferred to the regions or communities.
- ▶ The **regions** manage employment services, guiding unemployed individuals toward suitable jobs and helping employed workers find new opportunities. This division explains the existence of four Public Employment Services (PES):
 - **Brussels-Capital Region: Actiris**
 - **Flemish Region: VDAB (Vlaamse Dienst voor Arbeidsbemiddeling en Beroepsopleiding)**
 - **Walloon Region: Forem**
 - **German-speaking Community: ADG (Arbeitsamt der Deutschsprachigen Gemeinschaft)**
- ▶ The **communities** are in charge of the education and training of job seekers and workers.¹⁷

Responsibilities in **labour migration** are similarly divided among the different levels of government:

- ▶ The **federal state** regulates entry and residence rights of all third-country nationals, including labour migrants.
- ▶ The three **regions** and the **German-speaking Community** regulate the conditions under which third-country nationals may obtain work authorisations.
- ▶ While the Flemish and French **communities** do not have competences in labour migration policy, they are in charge of the recognition of foreign professional experience and the recognition of foreign diplomas which are necessary for regulated professions in the context of labour migration.

(16) Belgium state, 'Belgium, a federal state', https://www.belgium.be/en/about_belgium/government/federale_staet, last accessed 17 November 2025.

(17) Special Law on the 6th State reform of 6 January 2014, M.B. 31 January 2014. A.Mathot, 'Actief arbeidsmarktbeleid voor en na de staatshervorming', 2013, p. 19, last accessed on 26 January 2025.

Monitoring and evaluation of labour migration policies in Belgium remain uneven across governance levels, largely due to the regionalisation of competences in this policy area. There is no monitoring or follow-up mechanism at the national level. While the regions are monitoring and evaluating their own policy, the absence of a national evaluation framework and commonly agreed indicators to assess labour migration outcomes results in fragmented practices.

At federal level, the **Federal Migration Centre (Myria)**, an independent public institution, plays a central role in evaluating labour migration policies, notably by:¹⁸

- ▶ conducting research on migration trends and the socio-economic integration of third-country nationals, including the impact of labour migration policies on employment, working conditions, and inclusion;
- ▶ issuing policy recommendations aimed at improving the effectiveness and fairness of labour migration policies;
- ▶ advocating for migrants' rights and raising awareness of issues related to labour migration.

At regional level, each region conducts consultations and collects feedback from local councils, regional employment services, and employers. In practice, this is complemented by broader monitoring activities, including the collection and analysis of data on work authorisations, which are used to identify trends and inform policy adjustments.

All four **Public Employment Services (PES)** conduct labour-shortage assessments, supported by research institutes such as *Steunpunt Werk* in Flanders and *view.brussels / Bruxelles Formation* in Brussels, as well as input from **advisory bodies**, often composed by employer and employee organisations.

In Brussels, **Actiris** provides policymakers with analyses and recommendations on labour market developments and employment programmes. The **Brussels Center for Intercultural Action (Centre Bruxellois d'Action Interculturelle - CBAI)** carries out regular evaluations of public policies related to social cohesion and third-country nationals integration in the region, issuing recommendations through its annual publications. In addition, the management committee of **Actiris** and the **Economic and Social Council of Brussels (Brupartners)** provide advice on labour migration policy.

In Flanders, the **Advice Commission on Economic Migration (Adviescommissie Economische Migratie - ACEM)** within the **Social Economic Council of Flanders** (Sociaal-Economische Raad van Vlaanderen - *SERV*) has, since 2017, advised the Flemish Government on social, economic, and administrative issues related to the employment of foreign workers and self-employed foreign nationals, as part of the mandatory legislative cycle. The committee brings together representatives of employers' and workers' organisations and several ministerial departments,

(18) Myria is an independent public institution. For more information, visit: www.myria.be.

including Work and Social Economy, Economy, Science and Innovation, Employment and Vocational Training, and Asylum and Migration. The **ACEM** also formulates recommendations regarding labour migration policy.

In Wallonia, no formal body is specifically mandated to evaluate the outcomes of regional labour migration policies. However, the region may seek input from **Forem** and the **Economic, Social and Environmental Council of Wallonia (Conseil économique, social et environnemental de Wallonie - CESE)** when needed.

In the German-speaking Community, consultations on labour migration issues take place with the **ADG**, the department of employment from the Ministry of the German-Speaking Community and the **Economic and Social Council (Wirtschafts- und Sozialrat der Deutschsprachigen Gemeinschaft)**.

2.2 PUBLIC AND POLITICAL DEBATE

Between 2021 and 2025, labour migration as a response to labour shortages has been a recurring topic of debate in Belgium at both federal and regional levels, involving social partners and gaining attention in the media. The debate has continued following the formation of the new federal government in January 2025. These debates have centred on economic priorities with regards to social protection, enhancing the efficiency and accessibility of legal migration pathways, and examining alternative measures such as the activation of certain categories of third-country nationals.

Federal Level. The Interministerial Conference on Migration and Integration (*Conférence interministérielle sur la Migration et l'Intégration / Interministeriële conferentie 'Migratie en Integratie'*), created in 2020, met in July 2023 to address labour migration. It agreed on measures to combat exploitation, streamline procedures, and activate international protection applicants for employment. These debates reflected growing concern about abuse of labour migrants and the need for faster permit processing.¹⁹

In March 2025, the new Minister for Asylum and Migration, and Social Integration, Anneleen Van Bossuyt presented her policy orientation paper to the Chamber of Representatives. Key measures include promoting highly skilled migration, accelerating and rationalising single permit procedures, and imposing integration requirements for family reunification.²⁰

Employers and business federations have raised repeated concerns about lengthy processing times for single permit applications—sometimes exceeding five months—and their negative impact on companies' ability to recruit internationally and remain competitive in the war for talent.²¹

Brussels-Capital Region. The adoption of the Economic Migration Ordinance²² in 2024 sparked debates in the regional parliament and among social partners. It included discussions on whether labour migration should be complemented by measures to regularise undocumented migrants.²³ The *Economic and Social Council of Brussels (Brupartners)* issued several recommendations during these debates, calling for greater harmonisation between the different shortage occupation lists across the country.²⁴ It also stressed the need to improve procedures for diploma and professional experience recognition, which remain lengthy and fragmented, creating barriers to labour market integration. *Brupartners* also raised the possibility of allowing in-country status changes for foreign nationals awaiting decisions on non-employment-based residence applications, enabling employers to retain workers already present in Belgium and reducing reliance on irregular employment.

(19) Nicole De Moor, 'Interministeriële Conferentie pakt misbruik en uitbuiting bij arbeidsmigratie aan', https://www.nicoledm.be/interministeri_le_conferentie_pakt_misbruik_en_uitbuiting_bij_arbeidsmigratie_aan, last accessed on 13 November 2025.

(20) Chambre des représentants de Belgique, 'Exposé d'Orientation Politique, Asile et Migration - DOC 56 0767/037', 13 March 2025.

(21) See for example: De Tijd, 'Vlaanderen verstrengt regels voor arbeidsmigratie', <https://www.tijd.be/politiek-economie/belgie/vlaanderen/vlaanderen-verstrengt-regels-voor-arbeidsmigratie/10513966.html> and Voka, 'Aan de slag met arbeidsmigratie', 20 March 2024, <https://issuu.com/vokavzw/docs/vokawijzer2024pageslow>, last accessed on 21 November 2025.

(22) *Ordonnance relative à la migration économique du 1 février 2024, M.B. 19.03.2024 (FR) / Ordonnantie betreffende economische migratie van 1 Februari 2024, B.S. 19.03.2024 (NL)*.

(23) Brussels Parliament, Plenary session 26 January 2024, Report NOS A-802/1 and 2 – 2023/2024, p. 7.

(24) Brupartners, 'Avant-projet d'ordonnance relative à la migration économique', March 2023; Brupartners, 'Projet d'arrêté du Gouvernement de la Région de Bruxelles-Capitale portant exécution de l'ordonnance relative à la migration économique', February 2024.

(25) ACEM mentioned a lack of concrete definitions for the new indicators, requesting transparency, objectivity, and clarification of “training offer,” and opposing the exclusion of occupations based on sector-level abuse indicators or regulated-profession requirements.

Adviescommissie Economische Migratie, ‘Aanpassingen BVR tewerkstelling buitenlandse werknemers’, 2025, <https://www.vlaanderen.be/publicaties/aanpassingen-bvr-tewerkstelling-buitenlandse-werknemers-advies-adviescommissie-economische-migratie>, last accessed on 10 December 2025.

(26) See for example: <https://www.vrt.be/vrtnws/nl/2023/02/21/700-vlaamse-arbeidskaarten-voor-turken-on-hold-gezet-na-mogelijk/>, last accessed on 21 November 2025.

(27) See for example: <https://www.vrt.be/vrtnws/nl/2022/09/08/bijna-500-arbeidskaarten-ingetrokken-bij-borealis-en-antwerp-con/>; <https://www.jobrouns.be/nieuws/minister-brouns-trekt-honderden-arbeidskaarten-in-bij-antwerp-container-transport-international-en-borealis> last accessed on 21 November 2025.

(28) <https://www.commissieeconomischemigratie.be/economischemigratie/publicatie/advies-wijzigingsbesluit-tewerkstelling-buitenlandse-werknemers>.

(29) See for example: De Tijd, 6 February 2024, <https://www.tijd.be/opinie/algemeen/doen-alsof-we-in-belgie-geen-arbeidsmigranten-hebben-kosten-miljarden/10524483.html>, last accessed on 12 November 2024.

(30) Conseil économique, social, et environnemental de Wallonie, op. cit., p. 9.

(31) Union wallonne des entreprises, ‘Pour une politique de l’emploi redynamisée !’, November 2023, p. 31.

(32) See examples: RTBF, 23 February 2024, <https://www.rtf.be/article/emploi-comment-resoudre-le-chomage-wallon-et-l-augmentation-des-metiers-en-penurie-11333518>. Bodart, V., Van der Linden, B. ‘Crise du COVID-19, rebond économique et difficultés de recrutement en Belgique’ (2022), *Regards économiques*, 168.

Flemish Region. Debates in Flanders have largely focused on the application of the “concentric model”, which prioritises activation of the internal labour reserve before considering recruitment from outside the EU, and on the methodology used to compile shortage occupation lists. The Advice Commission on Economic Migration (ACEM) (*Adviescommissie Economische Migratie*) issued critical opinions on the latest version of the list and the methodology established for compiling that list.²⁵ Other debates focused on how to combat fraud and to protect workers rights, triggered by some instances of fraud,²⁶ and of abuse of workers,²⁷ that were portrayed in the media. Lastly, the tension between a relatively restrictive labour migration system on the one hand,²⁸ and the flexible system of posting of workers on the other hand, remained a topic of debate.²⁹

Walloon Region. The *Economic, Social and Environmental Council (CESE)* urged accelerating and simplifying diploma recognition, as delays and administrative complexity remain major barriers for foreign workers in regulated professions.³⁰ Discussions also considered regularising undocumented migrants to address shortages—a proposal supported by CESE but not advanced into law. CESE further recommended revising the methodology for shortage occupation lists to better reflect labour market needs and align with Forem’s shortage occupations list. Another priority was easing mobility by allowing workers to change employers more easily, reducing dependency on a single sponsor and mitigating precariousness. *AKT*, the alliance between the Walloon Union of Companies (*Union Wallonne des Entreprises – UWE*) and the five Walloon Chambers of Commerce and Industry, echoed concerns about administrative burdens and called for improved coordination between federal and regional levels to shorten processing times, create legal pathways for future shortages, and centralise migration information.³¹ They also advocated for greater transparency in shortage list methodology and opening these lists to lower-skilled workers to fill persistent gaps in sectors like construction and care. Academics complemented these debates by proposing broader access to legal pathways and in-country applications for foreign nationals, including undocumented migrants, as a pragmatic response to structural shortages.³²

Beyond debates in the public and political sphere, these discussions have gradually translated into concrete regulatory reforms at the regional level.

(33) Arrêté du Gouvernement de la Région de Bruxelles-Capitale portant exécution de l'ordonnance du 1 février 2024 relative à la migration économique du 16 mai 2024, M.B. 11.06.2024 (FR)/ Besluit van de Brusselse Hoofdstedelijke Regering houdende uitvoering van de ordonnantie van 1 februari 2024 betreffende economische migratie van 16 mei 2024, B.S. 11.06.2024 (NL). Fragomen, 'Forthcoming Changes to Immigration Policy for Foreign Workers in Brussels', <https://www.fragomen.com/insights/belgium-forthcoming-changes-to-immigration-policy-for-foreign-workers-in-brussels-region.html>, last accessed on 26 January 2026.

(34) Besluit van de Vlaamse Regering houdende uitvoering van de wet van 30 april 1999 betreffende de tewerkstelling van buitenlandse werknemers van 7 december 2018, B.S. 21.12.2018. Fragomen, 'Changes to Immigration Policy for Foreign National Workers in the Flanders Region', <https://www.fragomen.com/insights/belgium-changes-to-immigration-policy-for-foreign-national-workers-in-the-flanders-region.html>, last accessed on 26 January 2026.

(35) Besluit van de Vlaamse Regering van 28 November 2025 tot wijziging van het besluit van de Vlaamse Regering van 7 december 2018 houdende uitvoering van de wet van 30 april 1999 betreffende de tewerkstelling van buitenlandse werknemers, B.S. 19.12.2025. Fragomen, 'Flanders to Implement Stricter Chain Liability, Reduced Labor Migration Pathways for Lower Skilled Roles, and New Government Fee', <https://www.fragomen.com/insights/belgium-flanders-to-implement-stricter-chain-liability-reduced-labor-migration-pathways-for-lower-skilled-roles-and-new-government-fee.html>, last accessed on 28 January 2026.

(36) Public Service of Flanders, Work & Social Economy, <https://www.vlaanderen.be/departement-wewis-werk-sociale-economie/goedkeuring-conceptnota-verscherpt-en-geintegreerd-arbeidsmigratiebeleid>, 19 May 2025, last accessed on 21 November 2025.

(37) Arrêté du Gouvernement wallon relatif à l'admission au travail de travailleurs étrangers du 6 juin 2024, M.B. 12.08.2024. Fragomen, 'Changes to Immigration Policy for Foreign National Workers in Walloon Region', <https://www.fragomen.com/insights/belgium-changes-to-immigration-policy-for-foreign-national-workers-in-walloon-region.html>, last accessed on 26/01/2026.

2.3 RECENT REGIONAL REFORMS IN LABOUR MIGRATION GOVERNANCE

Each federated entity has introduced measures over recent years designed to better align labour migration pathways with its respective labour market needs, institutional priorities, and governance frameworks.

Brussels-Capital Region. The Brussels government adopted an ordinance on labour migration on 1 February 2024, followed by a Decision³³ on 16 May 2024 implementing the ordinance as well as a ministerial order on 9 September 2024 to further clarify the rules. It is the first time that the Brussels-Capital Region adopted its own comprehensive legal framework for labour migration; until then, the region relied on federal legislation and introduced amendments via Decisions. The main changes are the introduction of the shortage occupation permit type and of a specific procedure for the labour market test permit type, creating a clear framework for recruiting third-country nationals in shortage occupations.

Flemish Region. The Flemish government amended its Decision³⁴ on 8 March 2024, in force from 1 May 2024, which refined both the shortage occupation and labour market test permit types. In December 2025, another Decision was adopted³⁵, amending the framework for attracting highly skilled and medium-skilled workers in shortage occupations, while excluding low-skilled third-country workers, with seasonal workers remaining an exception. It introduces fast-track procedures for highly skilled migrants, with decisions expected within 15 days, and targets processing of other permits within 30 to 45 days. Digitalisation of procedures, employer duty of care, stricter inspections, and collaboration with partner countries support labour migration, while integration measures and a concentric model of labour activation ensure migrants complement the local and regional workforce.³⁶

Walloon Region. The Walloon government amended its Decision³⁷ on 6 June 2024, effective 1 September 2024, which clarified the distinction between the shortage occupation permit type and the labour market test permit type, and defined the procedures and requirements for the labour market test, strengthening the regional framework for targeted international labour recruitment.

German-speaking Community. The German-speaking Community adopted a Decision on 31 August 2023, in force from 1 July 2023, redefining rules on audits and administrative fines. A subsequent Decision adopted on 14 December 2023, in force from 1 January 2024, partially implemented Directive 2021/1883 concerning EU Blue Card rules, aligning regional policy with EU labour migration standards.³⁸

These regional updates provide the foundation for targeted labour migration strategies, which are supported by a range of instruments aimed at addressing specific labour shortages. The following section presents an overview of the main policy instruments used in each region and in the German-speaking Community to attract, retain, and integrate workers where they are most needed.

(38) Order of the Government of the German-speaking Community on 31 August 2023 executing the Decision of 27 March 2023 regarding the monitoring and procedure on administrative fines in employment policy.
Order of the Government of the German-speaking Community on 23 May 2019 amending the Royal Decree of 9 June 1999 executing the law of 30 April 1999 regarding the occupation of foreign workers.

03

LABOUR MIGRATION TO ADDRESS LABOUR SHORTAGES



Labour migration has emerged as one of several tools deployed to address persistent shortages in the Belgian labour market. This section outlines the main permit categories available across regions, ranging from highly skilled permits to shortage-occupation routes and labour market test procedures ([3.1](#)), as well as the mobility partnerships and pilot projects that have been operating in Belgium ([3.2](#)).

3.1 NATIONAL INSTRUMENTS TO ADDRESS LABOUR SHORTAGES

In 2023, Flanders granted the highest number of initial work authorisations, totalling 10 003, while Brussels issued 3 614 and Wallonia approximately 2 400. The German-speaking Community issued 47 work authorisations during the same period. These figures underline the strong demand for foreign labour in Flanders, which has the highest employment rate and the lowest labour market slack, compared to Brussels and Wallonia where unemployment remains higher ([see section 1.2](#)).

While labour migration policies are defined at regional level, a number of common trends can be observed in terms of overall policy approach and the permit framework used.

Across Belgium, pathways for highly skilled migration are based on an employment-driven model³⁹, whereby third-country nationals must first be selected by an employer. Admission is granted provided that applicants meet specific requirements, notably relating to their level of education or managerial role, as well as a minimum salary threshold for immigration purposes. By contrast, pathways for medium- and low-skilled workers rely in part on an occupation-driven model. While these pathways also require employer selection, access is restricted to occupations listed as shortage occupations or to situations where no suitable candidate can be identified following a labour market test.

These shared policy approaches are operationalised through a common set of permit types used by all regions⁴⁰, namely:

- ▶ Highly Skilled Single Permit (and EU-directive based variants - EU Blue Card and EU ICT Permit);
- ▶ Shortage Occupation Single Permit; and
- ▶ Labour Market Test Single Permit.

Although these permit types are common to all regions, differences in eligibility criteria exist and have become more pronounced over time.

(39) Different models exist for regulating labour migration - employment-based, occupation-driven, and human-capital-oriented approaches. The full definitions of these models are available in the comparative EMN Study on Labour Migration in Times of Labour Shortages.

(40) Main permit types were determined based on statistics provided by the regions on the number of issued permits per permit types.

HIGHLY SKILLED WORKERS

Employers can use a simplified procedure without a labour market test for highly qualified professionals. All regions have opted for a similar labour migration policy for highly skilled workers by facilitating the work authorisation procedure when two criteria are fulfilled: a minimum **diploma** level and **salary**. In recent years, the highly skilled pathways have been modified bringing the following nuances:

- ▶ For EU Blue cards (in all regions), profiles in the IT sector are exempt from the diploma requirement if they can demonstrate sufficient work experience. This change is due to the implementation of the recast EU Blue Card Directive and was not a national initiative.⁴¹
- ▶ In Wallonia, for the highly skilled work authorisation the diploma requirement is not imposed if the foreign worker can demonstrate sufficient work experience, broadening the scope of this permit. A lower salary threshold has also been put in place for professionals under 30 years old, an approach which has already been in place in Flanders since 2019.
- ▶ Starting in 2026, Flanders' legislation explicitly states that only highly qualified positions are eligible, meaning that even if the diploma and salary requirement are met a position that is not considered as requiring higher qualifications cannot be filled via this route – a substantive check that was not previously included in the policy.

The **requirements** for a Highly Skilled work authorisation are:

Regions	Diploma requirement	Salary requirement	Other
Flanders ⁴²	Diploma from higher education of at least level 5 under the European Qualifications Framework	Min. 100% of the average gross annual salary (48 912 EUR/year in 2025) and 80% of the average gross annual salary under 30 y.o. and nurses and teachers) (39 129.60 EUR)	Highly skilled position
Brussels ⁴³	Diploma following three year-programme	Min. 78% of the average gross monthly salary (3 703.44 EUR/month in 2025)	/
Wallonia ⁴⁴	Diploma from higher education of at least level 6 under the European Qualifications Framework; or, Being a manager in the field of information and communication technologies, or a specialist in the field of information and communication technologies; or, Having acquired at least three years of relevant professional experience within 7 years preceding the application.	Min. of 50 310 EUR indexed every year (51 613 EUR/year - 41 290 under 30 y.o. for 2025)	/
German-speaking Community ⁴⁵		51 180 EUR for employment of maximum 4 years or 85 388 EUR/year for permanent employment	/

(41) Directive (EU) 2021/1883 of the European Parliament and of the Council of 20 October 2021 on conditions of entry to and residence in the European Union of non-EU nationals for the purpose of highly qualified employment.

(42) Article 17, 1° of the Flemish Decision of 7 December 2018.

(43) Article 20, 1° of the Brussels Decision of 16 May 2024.

(44) Article 23 of the Walloon Decision of 6 June 2024.

(45) Articles 9, 18.5 and 37 of the Royal Decree of 09/06/1999 executing the law of 30 April 1999 regarding the occupation of foreign workers.

SHORTAGE OCCUPATION LISTS

Employers can use a simplified procedure without a labour market test if the following **requirements** are fulfilled⁴⁶:

Regions ⁴⁷	Occupation list	Other
Flanders	Profession must appear on the regional shortage occupation list for migration purposes	The employee must have the relevant qualifications Screening of employee's profile Min. 0.8 FTE
Brussels	Profession must appear on the regional shortage occupation list for migration purposes	The employee must have the relevant qualifications
Wallonia	Profession must appear on the regional shortage occupation list for migration purposes	Additional obligations for employer related to travel and insurance costs

Between 2021 and 2025, all regions consistently report labour shortages in their list used for immigration purposes for the following sectors: healthcare, construction, transport, industry and manufacturing, as well as installation and maintenance.

The **methodology for drawing the shortage occupation lists for immigration purposes** vary across the three regions:

- ▶ In Brussels, Actiris identifies shortage occupations through a two-step process combining statistical analysis of Actiris job-offer data with extensive consultation of employer-facing advisors and sector representatives. The shortage occupation list for migration purposes includes only occupations with quantitative shortages from the Actiris list.
- ▶ Flanders determines its migration shortage list using strict quantitative criteria, focusing on medium-skilled occupations with persistent shortages, high vacancy numbers, and low labour market tension. Additional factors, such as training availability, risks of abuse, and essential professional requirements, can justify exclusions.
- ▶ In Wallonia, Forem defines its shortage list through a three-stage process: statistical analysis of Forem job-offer data, internal qualitative assessment, and external sector consultation. The shortage occupation list for migration purposes refines this base list by removing occupations without consistent shortages, low-skilled or highly skilled roles, and those with corrective labour market measures.

See *box* for more information.

(46) Article 18, para 2 of the Flemish Decision of 7 December 2018; Article 14, para 2, 1° of the Brussels Decision of 16 May 2024; Article 2, para 2, 1° of the Walloon Decision of 6 June 2024.

(47) In the German-speaking Community the immigration pathway for shortage occupations is limited to third-country nationals who have a long-term residence permit in another EU Member State.



BRUSSELS-CAPITAL REGION

The list of shortage occupations used for immigration purposes is updated on a yearly basis and currently contains 82 professions since July 2025.⁴⁸ Since 1 October 2024, Brussels makes use of a list of shortage occupations for migration purposes, which is a selection of a general shortage occupation list drawn following the market analysis of the Brussels observatory of employment and training (view.brussels) and the Studies and Statistics Department of Brussels institute for vocational training 'Bruxelles Formation'.

1. Statistical phase

Critical functions are determined from a statistical analysis of job offers received by Actiris during the period studied.

A function will be qualified as critical if it simultaneously satisfies all three of the following quantitative criteria:

1. a minimum number of 20 job offers received for this profession during the year;
2. a satisfaction rate of job offers for the profession lower than the satisfaction rate calculated for all professions;
3. an average duration necessary to close offers relating to this profession longer than the average duration of opening of all job offers.

A second statistical list is added, made up with functions for which a minimum of 20 job offers are received at Actiris and whose tension index (ratio between the labour reserve and the number of vacancies) is low (< 1.5).

2. Consultation phase

The lists resulting from the statistical analysis are then compared with the opinion of advisors from the Actiris Employers Department. This department is organised by sector of activity and is structured around four sectoral hubs and four Employment Training Center (*Pôle Formation Emploi / Polen Opleiding-Werk*). Each is made up of recruitment advisors, employer consultants, Individual Professional Training in Business (*Formation professionnelle individuelle en entreprise / Opleiding FPIE*) advisors, etc. These advisors who manage job offers maintain regular contact with the companies. That allows them to confirm or refute the critical nature of functions.

(48) Public Service of Brussels-Capital region, <https://economie-emploi.brussels/autorisation-travail-profession-penurie>, last accessed on 19 November 2025.

As part of this consultation, the advisors of the Actiris Employers Department may remove certain professions from the statistical lists or add some.

In addition to the validation of the list of critical functions, these consultations are an opportunity for the advisors to report and specify the cause or causes which are at the origin of the recruitment difficulties.

The list adapted after internal consultation is communicated to the representatives of the employers' federations and professional reference centres (*Centres de référence / Beroepsreferentiecentra*), now partially integrated within the Employment Training Centres.

They are invited to nuance and enrich the results. It also makes it possible to identify for each sector, on the one hand, the recruitment challenges and the responses provided to address them and, on the other hand, the main trends that shape the sector and their impact on employment and qualifications.

The shortage occupation list for migration purposes only includes occupations with quantitative shortages from Actiris' list.

FLEMISH REGION

The most recent list of medium-skilled shortage occupations for migration purposes in place since January 1, 2026, contains 21 professions, although each profession includes several positions.⁵⁰ The Decision of 28 November 2025⁵¹ defines the methodology for determining the list of medium-skilled shortage occupations.

The following indicators are taken into account:

- > the number of open vacancies on the labour market;
- > the cause and duration of the shortage;
- > the available labour reserve.

In addition, the Minister may take into account the following optional indicators:

- > the availability of vocational education and training and the geographical distribution of shortages;
- > indications that a sector is more than average subject to abuses, in which case occupations within that sector may be excluded from the list;
- > indications that foreign workers are unable to meet essential requirements for exercising or accessing a profession, in which case occupations may be excluded from the list.

(49) Ministerieel besluit tot vaststelling van de lijst met middengeschoolde functies waarvoor een structureel tekort aan arbeidskrachten bestaat, published 1 December 2025.

(50) Not yet published at the time of drafting this report.

WALLOON REGION

The most recent list of shortage occupations used for immigration purposes came into effect on 1 October 2025 and includes 56 professions.⁵¹ The list is defined according to the following steps:

1. Quantitative data

The first stage is based on a statistical analysis of the job opportunities advertised on Forem website over the course of a year, where the workplace is located in Wallonia. These job offers do not reflect all the recruitment needs of the job market, but only those positions for which companies have called on Forem to meet their recruitment needs. At this stage, occupations for which fewer than 15 unoccupied jobseekers are registered for every 10 job opportunities advertised by Forem are identified as being in labour shortage. The analysis considers only those professions for which at least 82 jobs have been advertised. These only include jobs for which information on the job level is indicated, those for which the job posting status is closed, and those for which the place of work is identified in Wallonia. Certain positions are removed from the list, such as inter-regional mobility positions, recruitment reserves, student jobs, flexi jobs, etc., as well as positions identified as potential duplicates.

2. Internal survey

This list of shortage occupations is then compared with the expert opinion of Forem's business advisors (over 200 employees) via an online survey. Their day-to-day contact with companies enables them to fine-tune the statistical results to include shortages caused by either 1) candidates who do not have the right experience or skills to fill the vacancy or 2) work conditions that might discourage candidates such as weekend work, low pay or heavy work.

3. External survey

The adapted list following the internal survey is then communicated to Wallonia's Sectoral Training Funds (or, failing that, to representatives of an activity sector) to also identify qualitative shortages.

In total, 95 external partners, mostly representing sectoral training funds, submit proposals for additions, deletions or changes, based on documented, objective information.

At the end of these three stages, the list of shortage occupation is drawn up and submitted to Forem Management Committee (made up of the social partners and employers' organisations).⁵²

(51) Public Service of Wallonia, Employment and Vocational Training, <https://emploi.wallonie.be/home/travailleurs-etranagers/permis-de-travail/vous-etes-employeur/que-devez-vous-faire/liste-des-metiers-en-penurie.html>, last accessed on 17 November 2025.

(52) Stakeholder consultations with Forem, November 2023.

The list of shortage occupations for migration purposes is defined by the Walloon Minister of Work, starting from the shortage occupation list of the Forem and removing the following professions from that initial Forem list:

- > professions for which there is not a constant shortage: constant shortage is defined as such when either professions are considered in shortage for 2 consecutive years or when professions are listed at least 3 years in the last 5 years;
- > low-skilled or unskilled professions, which the local market is expected to fill, including through short-term training;
- > highly qualified professions (for which other immigration pathways exist);
- > professions for which there are corrective actions in place on the labour market (e.g. training for a function in short supply).⁵³

LABOUR MARKET TEST (LMT)

While a Labour Market Test (LMT) is as a rule required for all work-authorisation applications, the exemptions to this LMT listed above (notably highly skilled and shortage occupations) are more commonly used in practice. As a result a LMT application is used in practice only for third-country national workers who are not eligible for any other permit types (for instance, because they do not meet the salary threshold or do not hold a higher education diploma; or because the job they are selected for does not occur on the shortage occupation list for migration purposes in the relevant region).

All three regions adhere to a so-called 'concentric model' for labour migration.⁵⁴ To fill a vacancy, employers are expected to look on a first level at the region's labour market, then to the other regions in Belgium and then to the European Economic Area (EEA) labour market. Only if no suitable candidate can be found within these 3 levels, an employer can recruit from outside of the EEA.⁵⁵ The purpose of the LMT is to ascertain whether it is indeed plausible that no candidate could be found, if needed through vocational training or individual vocational training that has yet to be undertaken or not, is suitable to occupy the job in question in an appropriate manner and within a reasonable period of time.⁵⁶

All three regions have refined their LMT procedure in the course of 2024, all installing a process whereby it is accepted that if a vacancy was published for a long period (i.e. 5 to 9 weeks depending on the region) by the PES of the relevant region which did not result in finding suitable candidates this is 'in principle' sufficient to demonstrate a real need for the employer to hire a foreign worker.

(53) Stakeholder consultations with REM of Wallonia, November 2023.

(54) Flanders, Jaarverslag 2019-2022, [Jaarverslag – Dienst Economische Migratie \(vlaanderen.be\)](#), last accessed on 14 October 2024.

(55) European Migration Network (EMN), 'Ad Hoc Query on labour market tests', 6 October 2024, <https://emnbelgium.be/publication/ad-hoc-query-labour-market-tests>, last accessed on 17 November 2025.

(56) Ibid.

In 2025, Flanders added a presumption of available labour market reserves and employers will have to refute this presumption to obtain a work authorisation and hence cannot simply rely on the required period of publication with VDAB.

Regions	Vacancy	Other
Flanders ⁵⁷	Vacancy published on VDAB and European Employment Services (EURES) ⁵⁸ for at least 9 weeks	Presumption of available labour market reserves Applies only to medium-skilled professions listed on VDAB Min. 0.8 FTE
Brussels ⁵⁹	Vacancy should be published for 5 weeks Evidence of applications received and reasons for non-selection	/
Wallonia ⁶⁰	Vacancy published on Forem and EURES for at least 5 weeks Attestation from Forem confirming no suitable candidates found locally	Additional obligations for employer related to travel and insurance costs
German-speaking Community	Vacancy published on ADG and EURES	ADG verifies whether there are suitable candidates on the labour market for the position

Brussels-Capital Region. Since 1 October 2024, in the Brussels-Capital Region, the employer must first publish a vacancy on the Actiris website for at least 5 weeks or use Actiris' recruitment services. Only when, after 5 weeks, no suitable candidate can be found, an employer may apply for a work authorisation. The employer must also disclose how many applications they received and why they were not retained.⁶¹

When the application for a work authorisation is submitted after this five-week period, or after making use of Actiris recruitment services, the advice of Actiris will still be requested. Actiris checks the job-seeker database to objectively evaluate the quantity of available candidates who are capable of performing the job satisfactorily and within a reasonable time, even with adequate vocational training.⁶²

Actiris communicates its advice to the Regional Employment Ministry (REM) of Brussels within 5 working days. This advice is only binding as far as the condition of labour market test is concerned for the delegated official of the REM of Brussels delivering the permit.

(57) Art. 18, para 1 of the Flemish Decision of 7 December 2018.

(58) EURES is a cooperation network formed by public employment services (PES). For more information: https://eures.europa.eu/eures-services/help-and-support_en.

(59) Art.11, para 3 of the Brussels Decision of 16 May 2024.

(60) Art. 2, para 3 of the Walloon Decision of 6 June 2024.

(61) Art. 11, para 3 of the Brussels Decision of 16 May 2024.

(62) Ibid., art 14 §1.

Flemish Region. On 1 May 2024, the Flemish legislation introduced four admissibility conditions for an application under the “other” category with labour market test.⁶³ The conditions were introduced to reinforce the concentric model and to attach more importance to the prior search by employers on the Belgian and EEA labour market, before looking for employees outside of these markets. In December 2025, new rules have been adopted, adding new requirements for this type of permit.

The application must meet all the following conditions:

- ▶ the position is listed on the annual shortage occupation study of the VDAB;
- ▶ the position requires a qualification of level 3 or level 4 in the Flemish Qualifications Framework⁶⁴;
- ▶ the vacancy for the job is published on the VDAB (in shared management) and the European Employment Services (EURES) platforms, for a continuous period of at minimum 9 weeks in the 4-month period immediately preceding the work authorisation application.

When the competent authority assesses the requirements, the presence of a suitable candidate is presumed in each of the following situations:

- ▶ The local tension indicator for the function in question is, during the entire four-month period immediately preceding the application for work authorisation, greater than or equal to 12. The local tension indicator indicates the tightness of the labour market, which is the ratio between the number of unemployed jobseekers in mediation and the number of available vacancies for a specific function in the Flemish Region, calculated and published monthly by VDAB.
- ▶ In the job vacancy, the requested qualifications are not proportionate to the duties to be carried out.
- ▶ During the period of the vacancy publication, the employer does not cooperate with the mediation by VDAB.

In the supporting documents, the employer may rebut this presumption. Without convincing supporting documents, the decision will be made based on the local tension indicator and on the feedback from VDAB regarding the vacancy.

German-speaking Community. In the German-speaking community, an employer must prove that they searched actively for staff on the Belgian and European labour market. In this context, the employer must send the copies of the job vacancies published on the website of the public employment service and the EURES platform. ADG must inform the administration how many vacancies there are in the same field and if they have candidates matching the description. If there are enough candidates on the local labour market who could fill the job vacancy, sometimes needing an additional training but capable of filling the job vacancy in a reasonable time, ADG gives a negative decision.⁶⁵

(63) Art. 18, §1, of the Flemish Decision of 7 December 2018.

(64) In the Flemish Qualifications Framework, qualifications are grouped into eight levels, from primary education to university. This promotes transparency and exchangeability of qualifications in the educational landscape and on the labour market. Level 2, 3 and 4 correspond with a high school level.

(65) European Migration Network (EMN), ‘Ad Hoc Query on labour market tests’, 6 October 2024, <https://emnbelgium.be/publication/ad-hoc-query-labour-market-tests>, last accessed on 17 November 2025.

Walloon Region. In the Walloon Region, since 1 September 2024, there are several ways to carry out a LMT and conclude that the local market cannot meet the job demand.⁶⁶

Forem recognises the following scenarios as passing the LMT:

- ▶ the employer has published, through Forem and EURES platform, a job offer relating to the function for a continuous period of at least five weeks during the one-year period immediately preceding the submission of the application for admission to work and no suitable candidate to perform the function satisfactorily has applied for the job; or
- ▶ the employer has appealed to Forem's 'active management'-procedure for the position concerned by the application and no candidate suitable for carrying out the position satisfactorily has applied for the job. This procedure is an analysis of pre-selected profiles; or
- ▶ following a pre-selection procedure for candidates carried out by Forem in collaboration with the employer, Forem finds that it is unable to present a suitable candidate for the position; or
- ▶ after an assessment by the delegated official that the justifications provided by the applicant prove that it was impossible to find within a reasonable period of time, among the workers available on the labour market of the French-speaking region, a jobseeker capable of satisfactorily filling the job concerned, even by means of adequate vocational training. The official will take into account the specific features of the job in question and the recruitment procedures carried out unsuccessfully by the employer.⁶⁷

(66) Art. 2 of the Walloon Decision of 6 June 2024.

(67) Ibid.

3.2 EU POLICY INSTRUMENTS TO ADDRESS LABOUR SHORTAGES

Belgium complements its national labour migration tools with participation in EU-level mobility partnerships and pilot projects aimed at facilitating legal, skills-based migration. In this context, Mobility Partnership Programs as a strategic tool helps to address persistent labour shortages across key sectors. By collaborating with partner countries, Belgium supports legal and circular migration pathways that match foreign talent with domestic labour market needs, while also promoting skills development and mutual economic benefits. These initiatives form part of a broader set of programmes that Belgium has engaged in to strengthen its workforce, support ethical recruitment, and ensure a more sustainable approach to labour mobility.

- ▶ **Pilot Project Addressing Labour Shortages through Innovative Labour Migration Models (PALIM) (March 2019 – April 2021)**
Focused on ICT workers from Morocco, this project aimed to address labour shortages in Flanders while enhancing participants' ICT skills and employability in Morocco and the international labour market.
- ▶ **IOM MATCH Project – Demand-Driven Circular Migration (January 2020 – December 2022 / January 2020 – April 2023)**
Implemented by International Organization for Migration (IOM) Belgium & Luxembourg, MATCH provided vocational training in destination countries (Belgium, Italy, Luxembourg, Netherlands) coupled with temporary job placements. The project targeted sectors with labour shortages, particularly ICT, technology, and engineering, while improving employability in home countries.
- ▶ **THAMM Project – Towards a Holistic Approach to Labour Migration Governance and Labour Mobility in North Africa (2021 – 2023)**
Implemented by Enabel (the Belgian Development Agency) and in collaboration with IOM and International Labour Organization (ILO), THAMM focused on governance of labour migration, protection of migrant workers, and skills development. It targeted young people in Egypt, Morocco, and Tunisia, offering pre-departure training and placements in Belgium and Germany.
- ▶ **Pilot Project for Entrepreneurial Mobility between Belgium and Senegal (PEM WECCO) (2021 – 2024)**
Implemented by Enabel, it is an entrepreneurial mobility scheme offering internships and training in Belgium for owners of micro and nano businesses from Senegal. The project involves Belgian business support mechanisms, universities, and private partners to facilitate temporary mobility, knowledge transfer, and business development.

- ▶ **Similar Project for Entrepreneurial Mobility in Ivory Coast (PEM N’zassa) (2022 – 2026)**
Following the PEM model, this initiative provides temporary mobility and business support for micro and small enterprises in Ivory Coast.
- ▶ **Entrepreneurial Mobility Link (EMLINK) Project (2023-2025)**
Funded by the EU through the Migration Partnership Facility (MPF) and implemented by International Centre for Migration Policy Development (ICMPD), this project pilots temporary mobility for outstanding entrepreneurs between Belgium and Georgia. It promotes access to new markets, job creation, foreign investment, and safe institutional dialogue on professional mobility.
- ▶ **Belgium-Suriname Skills Mobility Partnership (SMP) (2022-2025)**
A collaboration in the healthcare sector, where Suriname supplies Dutch-speaking healthcare workers to Belgium in exchange for financial and technical support for training and capacity building. Partners include Zorgnet⁶⁸, IOM, VDAB, and Chinta⁶⁹.
- ▶ **Displaced Talent for Europe (DT4E) (current)**
This project provides displaced persons and refugees residing in countries such as Jordan and Lebanon with employment opportunities in Belgium and other European countries. Funded by the EU and coordinated by IOM, it involves Talent Beyond Boundaries, Fedasil, VDAB, and Fragomen.

(68) Zorgnet-Icuro is the umbrella organization for Flemish hospitals, mental health initiatives and residential care facilities. See for more information: <https://www.zorgneticuro.be/>.

(69) Chinta is a Belgian organization that focuses on recruitment and training of nurses outside the EU for Belgian healthcare organisations. See for more information: <https://chinta.be/>.

04 CHALLENGES, LESSONS LEARNED, AND GOOD PRACTICES



Despite significant policy innovation across regions, several structural challenges continue to limit the effectiveness of labour migration pathways in Belgium. Stakeholder consultations point to fragmented governance, administrative bottlenecks, and practical barriers affecting both employers and workers. At the same time, a number of promising practices, ranging from digitalisation of procedures to targeted attraction measures, illustrate how specific obstacles can be mitigated. This section synthesises key challenges, lessons learned, and examples of good practices that inform ongoing reforms.

(70) OECD, 'Improving the Economic Migration Framework to Attract and Retain Qualified Talent in Flanders', 2025, pp. 161-162. OECD, 'Améliorer le cadre de la migration économique en Wallonie pour attirer et retenir des talents qualifiés', 2025, p. 68. Brussels-Capital region and the German-speaking Community were not part of the scope of these studies. Both studies are available here: <https://www.oecd.org/en/about/programmes/sg-reform/attracting-and-retaining-qualified-talents-in-flanders-and-wallonia.html>.

(71) Ibid.

Adviescommissie Economische Migratie, 'Beleidsprioriteiten 2024-2029', 2024, pp. 910; Conseil économique, social, et environnemental de Wallonie, op. cit., p. 9; Brupartners, 'Avant-projet d'ordonnance relative à la migration économique', 2023, p. 3 – while they do not report lengthy processing times, they raise the importance of administrative simplification to maintain fast processing. F. Van Huylenbroeck, 'Waarom de behandelingstermijn voor een gecombineerde vergunning (g) een probleem is', *Tijdschrift voor Vreemdelingenrecht*, 2023, p. 312.

(72) OECD, 'Améliorer le cadre de la migration économique en Wallonie pour attirer et retenir des talents qualifiés', op. cit., p. 66-69. Brupartners, 'Avant-projet d'ordonnance relative à la migration économique', 2023, p. 5. Adviescommissie Economische Migratie, 'Beleidsprioriteiten 2024-2029', 2024, p. 11.

(73) See for example:

Conseil économique, social, et environnemental de Wallonie, op. cit., p. 11. A. Weatherburn, E. Herman Kruihof, and C. Vanroelen, 'Labour migration in Flanders and the use of the single permit to address labour market shortages: The lived experiences of single permit holders working in medium skilled bottleneck professions', 2022, p. 19.

(74) *Loi modifiant la loi du 15 décembre 1980 sur l'accès au territoire, le séjour, l'établissement et l'éloignement des étrangers en ce qui concerne les conditions pour le regroupement familial du 18 juillet 2025 (FR)/ Wet tot wijziging van de wet van 15 december 1980 betreffende de toegang tot het grondgebied, het verblijf, de vestiging en de verwijdering van vreemdelingen wat de voorwaarden voor gezinshereniging betreft van 18 juli 2025 (NL).*

Fragomen, 'Family Reunification Pathway Restrictions', <https://www.fragomen.com/insights/belgium-family-reunification-pathway-restrictions.html>, last accessed on 28 January 2026.

4.1 KEY CHALLENGES & LESSONS LEARNED

FRAGMENTED GOVERNANCE AND LACK OF A SINGLE NATIONAL STRATEGY

Belgium faces several structural challenges in the governance of labour migration. A major difficulty is the fragmented governance system:

- ▶ Labour migration is managed at federal, regional (and German-speaking Community) levels, preventing the development of a single national strategy.
- ▶ The OECD has reported a lack of alignment and communication between different public administrations as a real obstacle to providing clear and coordinated services to employers and foreign talent in Flanders and Wallonia. It recommends mandating authoritative institution(s) with a clear mandate to lead on talent migration and retention.⁷⁰

ADMINISTRATIVE AND PROCEDURAL BOTTLENECKS

The practical need for coordination between the federal, regional, and community levels in Belgium's labour migration policy is evident from:

- ▶ Persistent challenges with lengthy permit procedures and fragmented public-facing information: delays of up to 9 months have been reported, hindering employers' ability to recruit and creating precarious situations for third-country national workers during renewals.⁷¹
- ▶ Recognition of foreign qualifications: the lengthy processing times, costs and administrative burden have been reported as obstacles to access the labour market for third-country national workers.⁷²
- ▶ Dependency on employment: in the initial years, work-authorisations are connected to a specific employer. A change of employer can put third-country nationals in a precarious situation in case of delays or issues to obtain a single permit for the new employer, limiting mobility options within Belgium.⁷³
- ▶ Family reunification: recent legislative and policy changes made the facilitated process for family reunification with a single permit holder more restrictive. It impacts directly low and medium-skilled workers as well as some highly skilled workers.⁷⁴

METHODOLOGY OF SHORTAGE-OCCUPATION LISTS

While the regional lists rely on data from the PES, the OECD noted a need for a structurally integrated database in Wallonia and Flanders regions.⁷⁵ The lack of transparency regarding the methodology, the lack of consultation of social partners and how their input is taken into account, are also seen as not fully representative of the labour market.⁷⁶

INSUFFICIENT “SOFT” ATTRACTIVENESS

The lack of support to employers and third-country nationals regarding the settlement and integration in Belgium (such as on housing) can jeopardise retention. Employer federations such as VOKA⁷⁷ (Flanders’ Chambre of Commerce and Industry) and the Federation of Belgian Enterprises⁷⁸ have highlighted that fragmented governance and limited centralised information—particularly in English—create barriers for businesses and foreign workers, reducing Belgium’s competitiveness in attracting talent.⁷⁹

(75) OECD, ‘Improving the Economic Migration Framework to Attract and Retain Qualified Talent in Flanders’, op. cit., p. 157.
OECD, ‘Améliorer le cadre de la migration économique en Wallonie pour attirer et retenir des talents qualifiés’, op. cit., p. 69.

(76) See Adviescommissie Economische Migratie, ‘Aanpassingen BVR tewerkstelling buitenlandse werknemers’, 2025. Conseil économique, social, et environnemental de Wallonie, op. cit., p. 10.

(77) See for more information: <https://www.voka.be/eng>.

(78) *Fédération des Entreprises de Belgique (FR)/Verbond van Belgische Ondernemingen (NL)*, see for more information: <https://www.vbo-feb.be/en/>.

(79) Union Wallonne des Entreprises, op. cit., p. 31.

4.2 GOOD PRACTICES

1. THE FOLLOWING MEASURES HAVE BEEN IDENTIFIED AS DIRECTLY ADDRESSING LABOUR SHORTAGES THROUGH LABOUR MIGRATION:

▶ **More Accessible and Efficient Legal Pathways for Migrant Workers**

Belgium's regions have improved access to work authorisations for shortage occupations by clarifying procedures, refining labour market tests, and regularly updating shortage lists. The digitalisation with the governmental single-permit platform further speeds up processing and provides more transparency although the digitalisation process is not yet fully complete in all areas, for example at town halls, embassies, and for third-country nationals abroad.

▶ **Expanded Entry Channels for Young Professionals and Highly Qualified Migrants**

Flanders and Wallonia eased entry by lowering salary thresholds for young professionals and, in Wallonia, recognising professional experience instead of a diploma. These measures broaden the pool of eligible migrant workers for highly skilled positions.

▶ **Enhanced Attraction and Settlement Support**

Flanders, Brussels, and Wallonia have launched targeted campaigns and multilingual information platforms (e.g., *Flanders international houses*, *Your Future in Flanders*, *Work in Flanders*, *Professions en pénurie: des talents venus d'ailleurs*) to attract foreign workers and help them settle. These initiatives focus on practical guidance, international recruitment, and promoting shortage-occupation vacancies to a foreign audience.

▶ **Improving Mobility, Retention, and Protection of Migrant Workers**

The implementation of the EU Blue Card Directive and ongoing discussions on single-permit reform will make it easier for migrant workers to change employers and stay employed after job loss. New access to information, stronger sanctions against abusive employers, and enhanced rights act as safeguards, although their impact remains limited by restricted labour market access during the first years of residence and by a lack of information for certain third-country nationals.

2. THE FOLLOWING MEASURES HAVE BEEN IDENTIFIED AS DIRECTLY ADDRESSING LABOUR SHORTAGES WITHOUT USING LABOUR MIGRATION:

- ▶ **Strengthening Domestic Activation, Matching, and Guidance Systems**

Regions have invested in job-matching improvements, personalised counselling, and activation of unemployed or inactive residents before turning to migration. Initiatives include Actiris' campaigns, VDAB–Agoria collaborations, Forem's strengthened training-to-employment pathways, and a new Decision in the German-speaking community for needs-based placement.
- ▶ **Expanding Training and Upskilling to Redirect Jobseekers into Shortage Occupations**

All regions provide intensive training programmes—such as Wallonia's *Coup de poing pénurie*, Flanders' bottleneck premium, and tailor-made company training—to rapidly equip jobseekers with skills needed in shortage sectors. These courses often come with strong incentives (continued benefits, allowances) and sometimes guaranteed job offers.
- ▶ **Improving Employment Conditions and Job Attractiveness**

Several initiatives aim to retain and attract local workers by improving working conditions, stability, and career prospects. Examples include ESF+ programmes promoting inclusion and lifelong learning, Flanders' emphasis on permanent contracts, and sectoral reforms such as the new IFIC salary grid and specialised bonuses for health workers.
- ▶ **Financial Incentives for Employers and Jobseekers**

Regions offer a range of financial tools—such as *activa.brussels*, Flanders' job bonus and employer subsidies for long-term unemployed, and Wallonia's construction bonus—to encourage hiring in shortage sectors or support jobseekers during training. These incentives reduce labour costs, support income stability, and make shortage occupations more attractive for domestic workers.
- ▶ **Improved Access to Vacancies and Labour Market Information**

Web platforms such as *actiris.brussels*, *Panorama des métiers*, VDAB's *Work in Flanders*, and *Jobs.adg.be* make job offers more accessible while informing jobseekers about skills, training, and career pathways. These tools aim to guide residents toward high-demand professions through easier navigation and clearer labour market data.
- ▶ **Sector-Specific Strategies for Domestic Workforce Reinforcement**

Employers and sectoral bodies (e.g. Agoria, health sector stakeholders) have developed targeted action plans focusing on sustainable employment, differentiated activation, and improved wage scales. These strategies aim to address shortages by making occupations more attractive to resident workers rather than relying on recruitment abroad.

CONCLUSION

Belgium's experience in addressing labour shortages through labour migration reflects both the potential and the limitations of its fragmented governance structure. While regional autonomy enables policies to be tailored to specific labour market needs, this institutional complexity continues to challenge the emergence of a coherent national strategy. Differences in shortage-occupation methodologies, data systems, and procedural practices across regions, combined with the absence of a single overarching coordination mechanism, create administrative burdens for employers and complicate the navigation of procedures for third-country nationals.

Throughout the reference period, all regions introduced substantial updates to their legal and procedural frameworks, refining labour migration pathways for shortage occupations and strengthening labour market tests. These reforms improved clarity, structure, and governance of procedures, although administrative bottlenecks persist, including lengthy processing times, fragmented responsibilities in qualification recognition, and limited job-to-job mobility for certain permit holders.

Across regions, efforts were also made to reduce structural labour shortages by enhancing domestic activation measures, strengthening guidance and matching systems, and expanding training and upskilling initiatives. These measures are essential complements to labour migration pathways and align with broader European discussions on how to mobilise resident talent pools more effectively. Further insights on these complementary domestic approaches can be found in the (upcoming) EMN Study on ***Fostering sustainable labour market integration of migrants: skills matching and policies and instruments (to be published in May 2026)***, which provides a detailed analysis of measures supporting skills utilisation, matching, and the long-term integration of migrants into labour markets.



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