

July 2026



21 judicial agreements of public interest (CJIP) were signed these past twelve months.

More than 90 CJIP have been concluded since the creation of this alternative to judicial pursuit in 2016 by the Sapin II, including 32 with the PNF.

General trends:

- Affirming the role of self-disclosure.
(CJIP Colas Rail Asia et Blat USA).
- Greater alignment with the Deferred Prosecution Agreement (DPA) in common law jurisdictions.
- Implementation by local public prosecutors' offices of the CJIP-E and the redress of ecological damage.

Offenses & fines



Offenses

Number of CJIP

Associated fines

Deterrent fines



in environmental matters

12
(57%)

€150,000 on average
from €250 to €1,200,000
(Association Plaine Escapade ;
SAS Naphchimie)



€1,200,000
SAS Naphchimie



in matters of breaches of integrity
(i.e., influence peddling, corruption)

5
(24%)

€13,200,000 on average
from €499,150 to €29,745,974
(Société Périphériques et matériels de contrôle
SAS ; Société Colas Rail Asia)



€29,700,000
Société Colas Rail Asia



in tax matters

4
(19%)

€95,000,000 on average
from €2,259,000 to €267,531,000
(Société SHAD SA ; Société HSBC Bank plc)



€267,500,000
Société HSBC Bank plc

Developments in the CJIP in 2026?



Assessment carried out by the Club des juristes in a dedicated report

Criticisms of its mechanism and procedures:

- lack of criminal liability for legal persons
- liability of natural persons
- victims' rights
- transparency

Proposed improvements:

- limiting recourse to specialised public prosecutors' offices
- strengthening victims' access to information and their right to observe proceedings
- determining the fate of procedural documents in the event of the CJIP's failure



Failed attempt to abolish the CJIP via the draft bill on social security fraud.

Although passed by the National Assembly, the amendment was ultimately dropped by the Joint Committee.

Key takeaways

1

Steady progress in the environmental strand

since its introduction by the Act of 24 December 2020, as illustrated by the distribution of CJIPs.

2

Application of the scheme to entities of very different kinds,

including multinational groups, international banks, SMEs, local authorities, associations and local public bodies.

3

A proactive approach valued by the public prosecutors' offices,

such as

- the management of compliance programmes,
- self-disclosure,
- corporate cooperation,
- voluntary implementation of corrective measures.