

Unclassified

English - Or. French

2 July 2026

**DIRECTORATE FOR FINANCIAL AND ENTERPRISE AFFAIRS
COMPETITION COMMITTEE**

Competition and Corruption in Public Procurement – Note by France

26 June 2026

This document reproduces a written contribution from France submitted for Item 10 of the 149th OECD Competition Committee meeting on 24-26 June 2026.

Ori SCHWARTZ
Email : Ori.Schwartz@oecd.org

JT03590211

France

Introduction

1. In France, public procurement contracts are defined in the public procurement code as "contracts concluded by one or more buyers subject to the public procurement code with one or more economic operators, to meet their needs in terms of works, supplies or services, in exchange for a price or any equivalent"¹.

2. In 2024, public procurement contracts concluded in France represented a total amount of €233.3 billion for 223,383 contracts recorded by the Economic Observatory of Public Procurement (OECPP)². However, this figure is an underestimate, as contracts below certain thresholds are excluded from this count. In France, it is therefore estimated that public procurement as a whole, which includes both public contracts and concession contracts, accounts for approximately 14% of GDP, and thus plays a decisive role in the country's economic development³. In fact, public contracts determine the quality of infrastructure and public services that a State can provide to its citizens.

3. This significant economic weight structurally exposes public procurement to specific risks. As the OECD notes, "public procurement represents a core government activity that is particularly vulnerable to mismanagement, fraud and corruption". Two categories of infringements, each with their own distinct rationale, are particularly relevant. Collusion refers to horizontal coordination among bidders aimed at distorting competition. Corruption, on the other hand, involves a vertical relationship between at least one bidder and the person responsible for the contract in question. It should be noted that French law addresses breaches of integrity through seven criminal offences, among which corruption.

4. While these two practices belong to distinct legal frameworks, they both produce convergent harmful economic effects on public finances. Corruption and collusion effectively prevent public contracts from being awarded on the basis of merit-based competition, thereby undermining the efficiency of public procurement⁴. The Paris Court of Appeal, for example, ruled: "In the area of public procurement, [...] any exchange of information prior to the submission of bids is anti-competitive if it is likely to reduce the uncertainty in which all companies must find themselves. Such an exchange penalizes the public purchaser, who is forced to pay a higher price than would have resulted from undistorted competition"⁵. The concrete economic consequences of these practices are an artificial increase in prices, a decline in the quality of services, and the exclusion of the most economically efficient companies⁶.

¹ [Article L.1111-1 of the public procurement code.](#)

² [Economic Observatory of Public Procurement, Public Procurement Figures for 2024 and 2025.](#)

³ [Sénat, Report of the Commission of Inquiry on the Actual Costs and Procedures of Public Procurement and the Measurement of Their Multiplier Effect on the French Economy, July 2025.](#)

⁴ [Directorate General of the Treasury, Combating Corruption: Positive Effects on Economic Activity, Including in Developed Countries, Trésor Eco, 2016.](#)

⁵ [Paris Court of Appeal, November 3, 2009, Compagnie française de transport interurbain, No. 2009/01024.](#)

⁶ [Autorité de la concurrence, 2024 Annual Report, 2025.](#)

5. These economic consequences have also been quantified. With regard to corruption in public procurement, its cost in Europe has been estimated at a total of €4.3 billion between 2016 and 2021⁷. As for collusion in public procurement, although objective aggregate data are difficult to establish, an illustrative example can be found in Decision 11-D-02 of 26 January 2011 of the French Competition Authority concerning practices implemented in the sector of historic monument restoration: the cartel in question resulted in price increases for the public authority ranging from 19.3% to 24.7%⁸.

6. Beyond their converging effects, corruption and collusion may, in certain circumstances, reinforce one another. Collusion in public procurement may be based on *"the passivity or active complicity of the administrative bodies capable of detecting them, or at the very least suspecting their existence"*, meaning that corruption may constitute a condition for both the establishment and the durability of collusive arrangements⁹.

7. Regulatory and enforcement authorities therefore pursue two complementary objectives: promoting effective competition and safeguarding the integrity of administrative procedures. This relationship had already been highlighted in the contribution submitted by the French authorities to the OECD in 2010 through the analysis of two specific cases: the construction of high schools in the Île-de-France region between 1989 and 1996¹⁰, and the bituminous paving case in the Seine-Maritime department¹¹.

8. This contribution aims to analyse the legislative and regulatory developments that have occurred since that contribution (1), as well as the actors and instruments involved in fighting against these two practices in France (2).

1. The French legal framework has gradually been strengthened to address corruption and collusion in public procurement

1.1. Public procurement: an area particularly vulnerable to both corruption and collusion despite distinct legal regimes

9. The fight against corruption and the fight against collusion in public procurement involve two distinct legal frameworks and two different groups of stakeholders. Breaches of integrity¹² are addressed through seven criminal offences, namely extortion by a public official, active and passive corruption, misappropriation of public funds, favouritism, illegal acquisition of interests, traffic of influence and the revolving door offence. The offense of favouritism is of particular interest in the context of public procurement, as it penalizes the intentional violation of rules governing, in particular, the awarding of public

⁷ [European parlement, Stepping up the EU's efforts to tackle corruption. Cost of Non-Europe Report, 2023.](#)

⁸ [ADLC, decision 11-D-02 of 26 January 2011 concerning practices implemented in the sector of historic monument restoration, §659.](#)

⁹ Jean Cartier-Bresson, "Corruption and Anti-Competitive Practices: Initial Reflections Based on a Case Study," *Petites Affiches*, July 1, 1999.

¹⁰ [Decision 07-D-15 of May 9, 2007, concerning practices in public procurement contracts for high schools in the Île-de-France region.](#)

¹¹ [ADLC, Decision 05-D-69 of December 15, 2005, concerning anticompetitive practices identified in the road construction sector in Seine-Maritime.](#)

¹² [Articles 432-10 through 432-16 of the penal code.](#)

contracts. In France, it accounts for 15.5% of cases involving breaches of integrity¹³. The prosecution of all these practices falls primarily to the law enforcement authorities. Cases of great complexity fall within the jurisdiction of the specialised interregional courts (JIRS), and the National Financial Prosecutor's Office (PNF)¹⁴.

10. Collusion, by contrast, falls within the scope of competition law, in particular [article L.420-1 of the commercial code](#). Its enforcement is ensured by the French Competition Authority (Autorité de la concurrence - ADLC), acting jointly with the Directorate General for Competition Policy, Consumer Affairs and Fraud Control (DGCCRF). These regulators focus exclusively on the conduct of bidders, while leaving it to the administrative, financial and criminal courts to examine the conduct of public purchasers, although they may during the course of their investigations identify and report such conduct to competent authorities.

11. Over the past five years, the ADLC has issued nine decisions relating to anti-competitive agreements in the context of public procurement, including seven infringement decisions and two dismissals, imposing total fines amounting to approximately €33 million¹⁵. This figure should be put into perspective with the average of thirteen public procurement cases per year handled by the former Competition Council (Conseil de la concurrence) between 2004 and 2008¹⁶.

12. Between 2009 and 2024, forty settlement injunctions ("transactions-injonctions") imposed by the DGCCRF originated from evidence detected through the monitoring of public procurement procedures, representing a total amount of €2,089,090.

13. In addition to these two approaches, administrative judges play a cross-functional role in ensuring the legality of public procurement procedures and contract execution. In accordance with [article L. 551-1 of the code of administrative justice](#), administrative judges may, in fact, be asked to review the legality of a public contract. They may be led to annul a procedure marred by irregularities, when a failure to comply with the requirements of impartiality, equal treatment, or transparency has undermined the regularity of the competitive bidding process¹⁷. The administrative judge may also annul a public contract in the event of a breach of integrity. For example, between 2008 and 2021, out of the 435 public contracts declared irregular by the administrative courts, 60 of them presented a risk of a breach of probity or integrity, related to favouritism, unequal treatment of bidders, or a breach of the bids confidentiality¹⁸.

14. Although these two categories of violations fall under distinct legal frameworks, they overlap in certain areas, making it necessary to address them together. The issue of transparency illustrates this necessity. While transparency in procedures is essential for preventing corruption by limiting the purchaser's discretionary power, excessive transparency can, conversely, facilitate collusion. In this regard, the French Competition

¹³ [AFA, Analysis Note 2024, First-Instance Court Decisions on Breaches of Integrity 2021–2022, 2024.](#)

¹⁴ Established by the [Law of December 6, 2013, on combating tax fraud and major economic and financial crime.](#)

¹⁵ [ADLC, Testimony before the Senate Inquiry Committee on the actual costs and procedures of public procurement and the measurement of its ripple effect on the French economy, 2025.](#)

¹⁶ [Note from the French authorities, collusion and corruption in public procurement, 2010.](#)

¹⁷ [Conseil d'Etat, 7ème / 2ème SSR, 14 October 2015, n°390968.](#)

¹⁸ National Research Agency, Project on Detecting Corruption in Public Procurement, June 2021.

Authority noted in an Opinion issued on a proposed reform of the public procurement code that the prior disclosure of requirements and award criteria is likely to “facilitate the drafting of cover bids and thus make it easier to form cartels aimed at dividing up contracts”¹⁹.

15. These interactions are also reflected within the commercial code through [article L. 420-6](#). In fact, this article provides that “any individual who fraudulently takes a personal and decisive part in the design, organisation or implementation of the practices referred to in [articles L. 420-1](#), [L. 420-2](#) and [L. 420-2-2](#) shall be punishable by four years' imprisonment and a fine of €75,000”. This provision bridges the gap between competition law and criminal law, allowing the same practice to be addressed simultaneously from an administrative perspective for the legal entity and from a criminal perspective for individual persons. An anticompetitive agreement may therefore fall under both competition law and criminal law, particularly when it involves breaches of integrity such as favouritism or corruption.

16. The Île-de-France high schools case, already referred to in the French contribution submitted to the OECD in 2010, provides an illustration. In 2007, the Competition Council (now the Competition Authority) sanctioned a broad market-sharing cartel involving major construction groups and their subsidiaries. Parallel to the proceedings before the Competition Council, criminal investigations led to prosecutions and convictions in which practices of collusion, favouritism and corruption were also identified. It was established that an offence of favouritism committed by the executive authorities of the Île-de-France Region had been intended to secure the implementation of the cartel among companies affiliated with the major construction groups, enabling them to divide public contracts among themselves. Since that decision, the French legal framework has progressively evolved in order to better address the risks of corruption and collusion in public procurement.

1.2. The evolution of French legal frameworks applicable to corruption and collusion in public procurement since 2010

17. Efforts to prevent corruption and collusion in public procurement have been strengthened through numerous amendments to the legal framework governing public procurement since 2010. One of the most significant developments has been the digitalisation of procurement procedures. Since 1 October 2018²⁰, procurement procedures above a threshold requiring publication and competitive tendering have to be conducted electronically. As of 1 April 2026, this threshold is set at €60,000 excluding tax²¹.

18. Digitalisation entails the electronic availability of procurement documents, communications and invoicing, as well as the mandatory use of an electronic procurement platform, known as the *buyer profile* (*profil d'acheteur*), which ensures the secure receipt of bids.

19. Public purchasers have also been required, since the [law of 7 October 2016 for a Digital Republic](#) (*Loi pour une République numérique*), to make essential data relating to their public contracts available in an open and freely reusable format. These data, published

¹⁹ [Competition Council, Opinion No. 00-A-25 of November 20, 2000, regarding a draft decree reforming the Public Procurement Code, 2000.](#)

²⁰ As required by [Order No. 2015-899 of July 23, 2015](#) and by [Decree No. 2016-360 of March 25, 2016, regarding public procurement.](#)

²¹ [Article R.2132-2 of public procurement code.](#)

on the national open data portal data.gouv.fr, have covered since 1 January 2024 more than forty pieces of information²², such as the subject matter of the contract, the amount, the date of conclusion, and the name and postal code of the successful tenderers²³.

20. These transparency improvements have also been accompanied by changes to the powers of public procurers under the Public Procurement Code. Public procurers have been granted new powers to exclude economic operators with the transposition into French law of Directives 2014/24/EU and 2014/23/EU via [Order No. 2014-899 of July 23, 2015](#), now codified in [articles L. 2141-1 through L. 2141-14 of the public procurement code](#). [Article L. 2141-9](#), for example, allows the procuring entity to exclude economic operators against whom it has sufficiently probative evidence or a series of serious, substantial, and consistent circumstantial evidence from which it can be inferred that they have entered into a collusive agreement to distort competition. [Article L. 2141-1](#) provides for automatic exclusion of persons who have been the subject of a final conviction, particularly for breaches of integrity. These two provisions constitute tools available to public procurers to jointly prevent corruption and collusion; however, they are rarely used in practice by procurers due to the risk of legal action by the excluded company. The Council of State has, moreover, recently defined the scope of this exclusion power. In a decision dated February 16, 2024, it ruled that exclusion by the procuring entity cannot be based on acts committed more than three years prior²⁴.

21. Evolutions in competition criminal law are also a key to strengthen the fight against these two distinct practices. [Law No. 2020-1672 of December 24, 2020, on the European Public Prosecutor's Office](#), has indeed expanded the jurisdiction of the National Financial Prosecutor's Office (PNF) to include offenses under [article L. 420-6 of the commercial code](#), enabling the joint prosecution of anti-competitive practices and related breaches of integrity. In its 2022 activity report, the PNF noted that it had "*taken on litigation involving violations of competition law*": 16 criminal proceedings were then ongoing in connection with such violations, most of which were accompanied by a related integrity offense. As indicated by the PNF as early as 2021, this evolution responds to "*the shared objective of ensuring efficiency and consistency in the handling of administrative and criminal cases, particularly with regard to sanctions*"²⁵.

22. This extension of jurisdiction enabled the PNF to include anti-competitive conduct within the scope of the judicial public interest agreement (Convention judiciaire d'intérêt public - CJIP) concluded on 10 February 2025 with the company Paprec²⁶. The CJIP is a negotiated settlement mechanism allowing the public prosecutor to offer a legal entity suspected of certain offences an alternative to criminal prosecution. In this case, the Paprec CJIP concerned both the fraudulent participation in unlawful agreements with several competitors in the waste management sector during tender procedures and multiple breaches of probity, including active corruption and the concealment of favouritism. It therefore constitutes the first example under French law of a joint settlement mechanism addressing offences falling simultaneously within the scope of competition law and criminal law relating to probity.

²² [Order of 22 December 2022 on the essential data of public procurement contracts](#).

²³ [Cour des comptes, Evaluation of Anti-Corruption Policy, Thematic Report, 2025](#).

²⁴ [Conseil d'État, 7ème - 2ème chambres réunies, February 16, 2024, n°488524](#).

²⁵ [National Financial Prosecutor's Office, 2021 Summary, p. 14](#).

²⁶ [Ministry of Justice, Public Interest Judicial Agreement \(CJIP\) entered into between the Public Prosecutor for Financial Matters at the Paris Court and Paprec Group, February 2025](#).

23. Finally, the French legal framework regarding collusion and corruption has evolved with the enactment of [Law No. 2016-1691 of December 9, 2016, on transparency, the fight against corruption, and the modernization of economic life](#), known as the Sapin 2 Law. This law requires certain companies to adopt measures to prevent and detect breaches of integrity under the supervision of the French Anti-Corruption Agency (AFA), established by the same law. More specifically, Article 17 of the Sapin 2 Law provides for the obligation for large companies to implement a system for the prevention and detection of breaches of integrity, known as an anti-corruption system. This article defines a set of eight measures and procedures, based on a risk assessment. The law also establishes a performance obligation, under which the AFA is responsible for verifying the existence, quality, and effectiveness of the anti-corruption system implemented. In the event of a breach of these obligations, the AFA's sanctions committee may order the company to adapt its internal compliance procedures designed to prevent and detect acts of corruption or traffic of influence, and impose a monetary fine.

24. Although the Sapin II Law was designed primarily to prevent breaches of probity, it has also had effects for the detection of anti-competitive practices. The obligation to conduct risk mapping may lead companies to identify anti-competitive conduct within their organisations. In a recent decision of the French Competition Authority, a company approached the head of the investigative services (also known as "*Rapporteur Général*") to disclose an anti-competitive agreement and seek the benefit of the leniency procedure. This disclosure followed an internal investigation conducted to identify corruption risks pursuant to the Sapin II Law and led to the discovery of a cartel organised by certain employees. This example illustrates how anti-corruption compliance obligations under the Sapin II Law may indirectly contribute to the detection of collusive practices in public procurement.

25. Furthermore, the Sapin II Law introduced a whistleblower protection framework that contributes to both corruption and collusion. It enables individuals to report or disclose information concerning infringements such as breaches of probity or anti-competitive practices to the competent authorities. Since 2022, the DGCCRF and the French Competition Authority have been designated as competent authorities to receive reports from whistleblowers who are aware of anti-competitive practices in the context of public procurement²⁷. The framework guarantees whistleblowers anonymity, confidentiality of their reports, and protection against potential legal retaliation.

26. The French legal framework has evolved considerably since the previous contribution submitted by the French authorities in 2010 and now provides, in many situations, tools to address jointly the risks of collusion and corruption in public procurement. Beyond these legislative evolutions, the French authorities have also strengthened their cooperation and developed dedicated tools to fight against these two practices in coordination.

²⁷ Since [Decree No. 2022-1284 of October 3, 2022, regarding procedures for receiving and processing reports submitted by whistleblowers](#).

2. The French institutional ecosystem has gradually evolved to address both corruption and collusion in public procurement through appropriate tools and coordination mechanisms

2.1. The competent authorities have developed appropriate cooperation mechanisms to fight against corruption and collusion in public procurement

27. The authorities in charge of fight against corruption and collusion benefit from several cooperation mechanisms, which are structured around two complementary areas: mechanisms for competition authorities to refer cases to the public prosecutor's office, and mechanisms for the exchange of information among authorities.

28. With regard to reporting mechanisms, [article 40 of the code of criminal procedure](#) constitutes one of the main provisions. It provides that "*any authority, public officer or civil servant who, in the performance of his or her duties, becomes aware of a crime or criminal offence is required to notify the Public Prosecutor without delay and to transmit to that magistrate all relevant information, reports and records related*". Accordingly, where officials of the competition authorities detect evidence of breaches of probity in the course of their investigations, they are under a legal obligation to refer the matter to the Public Prosecutor. It is therefore common for officials of both the DGCCRF and the French Competition Authority to notify the prosecutor after identifying potential criminal offences.

29. The French Competition Authority also benefits from a second reporting mechanism under [article L.462-6 of the commercial code](#), which enables it to transmit to the Public Prosecutor evidence contained in its case files that may justify the application of [article L.420-6 of the commercial code](#). Whereas [article 40 of the code of criminal procedure](#) may be invoked at any stage of an investigation, [article L.462-6](#) is intended to operate at a later stage, after the Board of the French Competition Authority has issued a decision imposing sanctions for anticompetitive practices. As noted by the President of the French Competition Authority, Mr Benoît Cœuré, in 2023, "*the Authority may also transmit to the Public Prosecutor evidence relating to criminal offences independent of competition law (corruption, insider trading, etc.), without any subsequent interaction between the administrative and criminal proceedings*"²⁸.

30. As regards information-sharing mechanisms, [article L.463-5 of the commercial code](#) allows the French Competition Authority, upon request, to obtain access to reports, investigation records and other documents from criminal proceedings that are directly related to the anticompetitive practices it is investigating. This mechanism contributes to the proper coordination of administrative and criminal proceedings. On the basis of information transmitted by the judicial authorities, the French Competition Authority may address the competition law aspects relating to undertakings, while the criminal proceedings deal with issues concerning individuals and offences falling outside the scope of competition law. Two landmark cases have benefited from this procedure: the public works case in Île-de-France and the public procurement case involving high schools in Île-de-France, both of which were already mentioned in the 2010 French contribution. [Article L.450-7 of the commercial code](#) also provides for a supplementary mechanism allowing the Authority's investigators to access any document or piece of information held by government agencies, independent administrative authorities, and public entities. This mechanism has made it possible to impose sanctions under competition law for certain practices that were detected in the context of the fight against corruption. In the low-voltage

²⁸ [Michaël COUSIN Jean-François BOHNERT Benoît CŒURÉ, The Intersection of Criminal Law and Competition Law, 2023.](#)

electrical equipment case, the Deputy to the “*Rapporteur Général*” requested the French Anti-Corruption Agency to transmit documents in its possession pursuant to this provision. The analysis of these documents helped corroborate the existence of practices falling simultaneously within the scope of competition law and criminal law²⁹.

31. These reporting and information-sharing mechanisms can furthermore be combined with joint investigations between the criminal judge and the competition authorities. Since the Hamon law, [article L. 450-1 of the commercial code](#) allows investigators from the French Competition Authority the DGCCRF to receive letters of request (“*commission rogatoire*”) from a criminal judge in charge of investigation³⁰. Within this framework, these investigators may submit a report on the basis of [article 40 of the code of criminal procedure](#); the public prosecutor's office may then refer the matter to criminal judge in charge of investigation, who in turn may issue letters of request to the investigators (whether from the DGCCRF or the Authority) to participate to the investigation jointly with a police unit. The Paprec case concretely illustrates the implementation of all these mechanisms. In June 2020 and then in April 2021, the BIEC (“*Brigade Interdépartementale d'Enquêtes de Concurrence*”) of the DGCCRF in Lyon transmitted to the PNF, on the basis of Article 40 of the code of criminal procedure, reports concerning suspicions of anti-competitive agreements and breaches of integrity committed in connection with the award of contracts and public service delegations in the waste treatment sector. The PNF opened a judicial investigation and entrusted the investigations, under letters of request, to both the Paris Gendarmerie Research Section and the BIEC in Lyon. The evidence gathered confirmed the initial suspicions and led to the conclusion of the CJIP of 10 February 2025.

32. This case therefore illustrates the interactions between the enforcement of anti-collusion and anti-corruption rules in public procurement, made possible in particular by mechanisms for information-sharing and joint investigations between authorities whose competences are normally separate.

33. Finally, beyond these formal mechanisms, the entities fighting against collusion and corruption have established coordination bodies. The working group on corruption related to organised crime, launched in September 2023 and co-chaired by the AFA and the Central Office for the Fight against Corruption and Financial and Tax Offenses (OCLCIFE), brings together the main law enforcement agencies (police, gendarmerie, customs, judicial services, etc.) and, depending on the agenda, other relevant agencies or services (DGFIP, DGCCRF, ANSSI, Tracfin, etc.). Enhanced vigilance and close coordination among State services are indeed essential to effectively prevent these practices³¹.

34. These cooperation mechanisms are, moreover, supported by operational tools developed by the various actors involved in order to detect and punish corruption and collusion in public procurement in a coordination.

²⁹ [Decision 24-D-09 of October 29, 2024, concerning practices in the low-voltage electrical equipment sector, §261 et seq. 2024.](#)

³⁰ [Article 108 de la loi n° 2014-344 du 17 mars 2014 relative à la consommation.](#)

³¹ [AFA, 2024 Annual Report, 2025.](#)

2.2. The tools available to these actors to detect corruption and collusion in public procurement

35. The detection of corruption and collusion in public procurement in France rely on a range of operational tools developed by the various competent authorities, which intervene in a complementary manner. With regard to the fight against anti-competitive practices, public procurement accounts for approximately 40% of the cases handled by the DGCCRF network. To ensure effective monitoring across the entire country, DGCCRF agents are located within interministerial departmental directorates such as the Regional Directorates for the Economy, Employment, Labor, and Solidarity (DREETS). Approximately 130 investigators dedicate part of their work to public procurement, with some of them working full-time in the most densely populated areas; this network also extends to the overseas departments³². At the regional level, the BIECs analyse the evidences submitted by local agents and coordinate the public procurement network at the regional level. At the central level, a unit dedicated to public procurement analyses the evidences and investigation reports submitted, coordinates the network at the national level, and with the French Competition Authority, in accordance with the provisions of the commercial code.

36. To detect these various practices, investigators look for several categories of evidence. With regard to bid amounts, they pay close attention to identical price proposals from multiple bidders, or to a range of proposals that are higher, and possibly lower, than the administrative estimate. Regarding the content of bids, similar presentations, identical errors or additions, omissions rendering the bid irregular, identical or similar wording in technical proposals, or the presence of similar documents in the proposals of two competing companies all constitute red flags. The bidders' conduct is also examined, particularly withdrawals after obtaining the bidding documents, refusal to correct a bid upon the buyer's request, or the systematic formation of consortia for low-value contracts aimed at eliminating competition and dividing up the contracts.

37. A thorough understanding of these various evidence relies on the specialised training of investigators, provided during initial training at the National School of Competition, Consumer Affairs and Fraud Prevention (ENCCRF), with a specific module dedicated to competition and public procurement delivered by experienced investigators. This training is supplemented by continuous professional training for all investigator in charge of these matters, to strengthen their knowledge and adapt it to new practices. Beyond detection, the DGCCRF also pursues a prevention objective by developing mutually beneficial relationships with public buyers, based on the exchange of information and the promotion of best practices at the local level. In that regard, webinars are organized for public procurers, in partnership with the State Procurement Directorate, for example, which enable to reach a broad and representative range of public procurers. Awareness campaigns are also being implemented by departmental and regional agencies targeting public procurers, to raise their awareness on both risks of anti-competitive practices and risks of breaches of integrity³³.

38. Educational initiatives were also carried out in 2026 at the national and European levels under the Technical Support Instrument (TSI), a program coordinated by the OECD and funded by the European Commission. Workshops were organized by the DGCCRF and the French Competition Authority to raise awareness among public procurers, on the

³² [Senate Committee on Public Procurement, Hearing with the DGCCRF, 2025.](#)

³³ [Dreets Bourgogne Franche Comté, Anticompetitive Agreements, and Public Administrations.](#)

one hand, and judges (administrative judges, the Court of Auditors, and regional courts of auditors), on the methodologies for identifying such practices and the information needed to detect anti-competitive practices³⁴.

39. The DGCCRF's regional network serves as an effective mechanism for detecting anti-competitive practices. The deployment of teams across the country enabled them to monitor approximately 5,000 markets in 2024 and a similar number in 2025. In this regard, the financial value of the contracts analysed by the DGCCRF has risen from €12 billion in 2020 to €34 billion in 2024, illustrating the effectiveness of the measures implemented by the DGCCRF. A significant proportion of the decisions issued by the ADLC regarding public procurement originate from reports submitted by the DGCCRF. This network also enables the detection of practices that undermine integrity, as it was the case in the Paprec affair, illustrating the interplay between the fight against collusion and corruption in public procurement.

40. In addition to the work of competition authorities, other entities fighting against collusion and corruption have also developed tools. In fact, in addition to the practical guides made available to public procurers by the Directorate of Legal Affairs (DAJ)³⁵, the AFA, for example, developed a public procurement guide in 2020 in collaboration with the Directorate of State Procurement (DAE) to prevent, detect, and address risks of corruption, favouritism, illegal conflicts of interest, or misappropriation of public funds³⁶. This guide is intended for all stakeholders involved in the public procurement cycle and identifies, at each stage of the procurement cycle, the most common risks as well as best practices for mitigating them. It is structured around the three phases of the procurement cycle, i.e., preparation, award, and execution, and serves as a reference tool for public procurers, enabling them to identify specific risk situations and to respond accordingly. It illustrates the preventive approach pursued in the AFA's work.

41. This effort to strengthen prevention and detection tools is part of a long-term strategy. The 2025-2029 National Multi-Year Anti-Corruption Plan, adopted by the government in November 2025 and comprising 36 measures, places particular emphasis on ensuring the integrity of public procurement and strengthening oversight of government entities. For local authorities, the plan aims to clarify the applicable legal framework and provide enhanced support to help smaller municipalities protect themselves against risks of integrity violations. Among other things, this plan provides for training all public officials on breaches of integrity, with particular attention paid to officials involved in public procurement, and strengthens detection capabilities through whistleblowing mechanisms and internal control tools³⁷. This long-term perspective is also reflected in France's international engagement, through which it actively promotes the strengthening of international standards and commitments in the fight against corruption in public procurement. In particular, in 2023 France put forward a resolution to strengthen transparency and integrity in public procurement at the Conference of States Parties to the

³⁴ [European commission, TSI - How it works, 2026.](#)

³⁵ [Legal Affairs Directorate of the Ministry of the Economy, Technical Data Sheets for Buyers, 2026.](#)

³⁶ [AFA, DEA, Guide to Public Procurement: Managing Corruption Risks in the Public Procurement Cycle, 2020.](#)

³⁷ [French Government, National Multi-Year Anti-Corruption Plan 2025-2029, 2025.](#)

United Nations Convention against Corruption³⁸, and, in support of its implementation, contributed both financially and through the participation of government experts to the publication of UNODC guidelines on the adoption of new technologies to fight against corruption in public procurement³⁹.

³⁸ Resolution 10/9, [Promoting Transparency and Integrity in Public Procurement in Support of the 2030 Agenda for Sustainable Development](#).

³⁹ ONUDC, [Non-Binding Guidelines on the Adoption and Use of Technologies to Combat Corruption in Public Procurement](#)