



SEPA u Crnoj Gori: Prednosti i izazovi

SEPA in Montenegro: Benefits and Challenges

JPM

PARTNERS

SEPA u Crnoj Gori: Prednosti i izazovi/ SEPA in Montenegro: Benefits and Challenges

Publisher: JPM | Partners

Delta House, 8a Vladimira Popovića street

www.jpm.law

Authors: Alma Karadjuzović Đindinović, Partner

Design and prepress: JPM | Partners

Copyright: © JPM | Partners 2025 All rights reserved.

Disclaimer:

The sole purpose of this publication is to provide information about specific topics.

It makes no claims to completeness and does not constitute legal advice.

The information it contains is no substitute for specific legal advice.

If you have any queries regarding the issues raised or other legal topics, please get in touch with your usual contact at JPM & Partners.

(i) Datum implementacije SEPA plaćanja

Crna Gora je 21. novembra 2024. godine postala članica geografskog područja SEPA (Single Euro Payment Area – Jedinstveno evropsko područje plaćanja u eurima), čime je stekla pravo da crnogorski bankarski sistem, zajedno sa Centralnom bankom Crne Gore (CBCG), započne proces pristupanja SEPA platnim šemama. Taj proces obuhvata tehničku i regulatornu pripremu.

U skladu s tim, CBCG je 1. aprila 2025. godine podnijela Evropskom savjetu za plaćanja (EPC) formalni zahtjev za priključenje SEPA platnim šemama. Zahvaljujući dobroj koordinaciji sa bankarskim sektorom, sve banke u Crnoj Gori su do 13. juna 2025. dobile odobrenje za pristup SEPA sistemu i upisane su u registar učesnika SEPA Credit Transfer (SCT) šeme pri EPC-u.

Datum 6. oktobar 2025. predstavlja ključni trenutak kada crnogorske banke počinju operativno korišćenje SEPA platnog sistema, omogućavajući građanima i privredi brže, sigurnije i povoljnije transakcije u eurima.

(i) Date of SEPA Payment Implementation

On November 21, 2024, Montenegro became a member of the SEPA geographical area (Single Euro Payment Area), thereby gaining the right for its banking system, together with the Central Bank of Montenegro (CBCG), to begin the process of joining SEPA payment schemes. This process includes both technical and regulatory preparations.

Accordingly, on April 1, 2025, the CBCG submitted a formal application to the European Payments Council (EPC) to join the SEPA payment schemes. Thanks to strong coordination with the banking sector, all banks in Montenegro obtained approval to access the SEPA system by June 13, 2025, and were registered as participants in the SEPA Credit Transfer (SCT) scheme at the EPC.

October 6, 2025, marks a key milestone when Montenegrin banks will begin operational use of the SEPA payment system, enabling faster, safer, and more affordable euro transactions for citizens and businesses.

(ii) Pravni okvir i regulatorne mjere

CBCG je 9. jula 2025. godine usvojila reformski paket koji donosi konkretne koristi za građane i privredu. Sastoji se od tri akta koja oslobađaju kretanje novca, ubrzavaju domaće i međunarodne transakcije i uvode evropske cijene i standarde:

1. Odluka o ograničenju visine naknade za izvršavanje kreditnih transfera u jedinstvenom području plaćanja u eurima (SEPA);
2. Pravila o izmjenama Pravila rada platnog sistema Centralne banke Crne Gore;
3. Odluka o izmjeni Odluke o utvrđivanju tarife po kojoj se obračunavaju naknade za usluge CBCG.

Šta to znači za građane i privredu?

(ii) Legal Framework and Regulatory Measures

On July 9, 2025, the CBCG adopted a reform package that brings concrete benefits for citizens and businesses. It consists of three acts that liberalize the movement of funds, speed up domestic and international transactions, and introduce European pricing and standards:

1. Decision on limiting the amount of fees for credit transfers executed in the SEPA area;
2. Rules on amendments to the Rules of Operation of the CBCG payment system;
3. Decision on amendments to the tariff schedule for CBCG payment services.

What This Means for Citizens and Businesses?

Prema odluci pod (1), od 6. oktobra 2025. banke ne mogu naplatiti naknadu veću od:

- prvi dnevni transfer fizičkog lica do 200 €: najviše 0,02 €;
- elektronske transakcije do 20.000 €: najviše 1,99 €;
- elektronske transakcije preko 20.000 €: najviše 25,00 €;
- uplate u poslovnici do 20.000 €: najviše 3,99 €;
- uplate u poslovnici preko 20.000 €: najviše 50,00 €;
- primanje SEPA transfera do 20.000 €: najviše 1,99 €, a za veće iznose do 25,00 €.

Prema odluci pod (2), od 18. avgusta 2025. produžava se radno vrijeme domaćeg platnog sistema. RTGS sistem (za transakcije iznad 1.000 €) radiće do 20:00 časova, a DNS sistem (za transakcije ispod 1.000 €) do 19:30, uz šest kliring ciklusa tokom dana.

According to item (1), starting October 6, 2025, banks may not charge citizens or businesses more than:

- first daily transfer by an individual up to €200: maximum €0.02;
- electronic transactions up to €20,000: maximum €1.99;
- electronic transactions over €20,000: maximum €25.00;
- deposits at a branch up to €20,000: maximum €3.99;
- deposits at a branch over €20,000: maximum €50.00;
- receiving SEPA transfers up to €20,000: maximum €1.99, and for larger amounts up to €25.00.

According to item (2), starting August 18, 2025, the operating hours of the domestic payment system will be extended. The RTGS system (for transactions above €1,000) will operate until 20:00, and the DNS system (for transactions below €1,000) until 19:30, with six clearing cycles per day.

Od sredine oktobra 2025. sistemi će raditi i vikendom, dok će od jula 2026, uvođenjem TIPS Clone platforme, plaćanja biti dostupna 24/7.

Prema odluci pod (3), ukida se naknada CBCG koja je do sada bila 30% viša za transakcije poslije 14:00 časova. Uvodi se jedinstvena, niža tarifa za cijeli operativni dan (08:00–20:00), što korisnicima osigurava fer i transparentne uslove bez dodatnih troškova.

(iii) Prednosti za bankarski sektor

Uvođenje SEPA plaćanja donosi bankama u Crnoj Gori značajne koristi kroz smanjenje operativnih troškova i unapređenje efikasnosti. Implementacija SEPA instant plaćanja omogućava pružanje bržih i sigurnijih usluga, čime se povećava povjerenje i konkurentnost na tržištu.

From mid-October 2025, the systems will also operate on weekends, while from July 2026, with the introduction of the TIPS Clone platform, payments will be available 24/7.

According to item (3), the CBCG will abolish the surcharge of 30% previously applied to transactions executed after 14:00. A single, lower tariff will apply for the entire operational day (08:00–20:00), ensuring fair and transparent conditions without extra afternoon costs.

(iii) Benefits for the Banking Sector

The introduction of SEPA payments provides Montenegrin banks with significant benefits through reduced operational costs and improved efficiency. The implementation of SEPA instant payments will enable banks to offer faster and more secure services, increasing trust and competitiveness in the market.

(iv) Prednosti za privredu i građane

SEPA plaćanja omogućavaju efikasnije, jeftinije i sigurnije prekogranične transakcije u eurima, što smanjuje troškove poslovanja i olakšava integraciju crnogorske privrede u evropski ekonomski prostor. Građanima donosi povoljnije uslove za slanje i primanje novca, veću transparentnost i sigurnost platnog prometa.

(v) Troškovi usklađivanja IT sistema

Implementacija SEPA sistema zahtijevala je značajna ulaganja u modernizaciju IT infrastrukture banaka. Neophodno je bilo prilagođavanje SEPA XML formatima, implementacija IBAN i BIC identifikatora te usklađivanje sigurnosnih protokola sa evropskim regulativama, uključujući PSD2 direktivu i principe jake autentifikacije korisnika (SCA). Iako su početni troškovi visoki, očekuju se dugoročne uštede kroz automatizaciju i smanjenje grešaka.

(iv) Benefits for Businesses and Citizens

SEPA payments enable more efficient, cheaper, and safer cross-border euro transactions, reducing business costs and facilitating the integration of Montenegro's economy into the European economic area. Citizens benefit from more favorable conditions for sending and receiving money, as well as greater transparency and security in payment transactions.

(v) Costs of IT System Alignment

Implementing the SEPA system required substantial investments in modernizing banks' IT infrastructure. Adjustments to SEPA XML message formats, implementation of IBAN and BIC identifiers, and compliance with European security regulations — including the PSD2 directive and strong customer authentication (SCA) principles — were mandatory. Although initial costs were high, long-term savings are expected through process automation and error reduction.

(vi) Uvođenje instant plaćanja u domaćem prometu

Centralna banka Crne Gore je 26. maja 2025. pustila u rad novu generaciju nacionalnog platnog sistema – RTS/X. To je najveća funkcionalna i tehnološka promjena od 2005. godine. Novim sistemom uveden je online kliring, koji omogućava da se međubankarske transakcije do 1.000 € obrađuju tokom cijelog dana, bez čekanja na fiksne kliring cikluse, što korisnicima omogućava gotovo trenutno raspolaganje sredstvima.

(vii) Pravne posljedice neusklađenosti

Neispunjavanje SEPA standarda i pravila može dovesti do sankcija CBCG-a, uključujući novčane kazne i ograničenja u radu. Banke su, prema ugovornim obavezama, izložene i pravnoj odgovornosti u slučaju kašnjenja ili grešaka u izvršenju transakcija, što može negativno uticati na ugled i povjerenje klijenata.

(vi) Introduction of Instant Payments in Domestic Transactions

On May 26, 2025, the Central Bank of Montenegro launched the new generation of the national payment system – RTS/X. This represents the most significant functional and technological change since its establishment in 2005. The new system introduced online clearing, enabling interbank transactions of up to €1,000 to be processed throughout the day without waiting for fixed clearing cycles, allowing users almost immediate access to their funds.

(vii) Legal Consequences of Non-Compliance

Failure to meet SEPA standards and rules may result in CBCG sanctions, including fines and operational restrictions. Banks are also contractually liable to customers for delays or errors in transaction execution, which could negatively impact their reputation and client trust.

U konačnom, pristupanje Crne Gore SEPA sistemu predstavlja veliki korak ka potpunoj finansijskoj integraciji sa evropskim tržištem.

Donosi brže, sigurnije i povoljnije transakcije, modernizuje bankarski sektor i povećava transparentnost, konkurentnost i povjerenje u finansijski sistem zemlje.

Ultimately, Montenegro's accession to the SEPA system is a major step toward full financial integration with the European market.

It brings faster, safer, and more affordable transactions, modernizes the banking sector, and increases transparency, competitiveness, and trust in the country's



Author



Alma Karađuzović Đinđinović

Partner

E: alma.kardjuzovic@jpm.law

JPM | PARTNERS

2 Šeika Zaida Street

81000 Podgorica

Montenegro

email: T: +382 20 672534

E: office.mne@jpm.law

www.jpm.law