

# MILCON' 26

International Scientific Conference

JUNE 25<sup>TH</sup>, 2026

PROCEEDINGS



# *Proceedings of Papers*

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**3rd International Scientific Conference MILCON'26,  
Skopje**



**June, 2026**

**Editor-in-Chief:** Nenad Taneski

**Technical Editor:** Monika Kachurova

**Publisher:** Military Accademy "General Mihailo Apostolski" – Skopje

CIP - Каталогизација во публикација  
Национална и универзитетска библиотека "Св. Климент Охридски", Скопје  
355.45(062.552)

INTERNATIONAL Scientific Conference MILCON'26 (2026; Skopje)  
Proceedings of papers [Електронски извор] / 3rd International  
Scientific Conference MILCON'26, Skopje; [editor Nenad Taneski]. -  
Skopje: Military academy "General Mihailo Apostolski", 2026

Начин на пристапување (URL): milcon26\_zbornik-final-24.06.2026-1\_0.pdf.  
- Текст во PDF формат, содржи 541 стр., илустр. - Наслов преземен од  
екранот. - Опис на изворот на ден 25.06.2026. - Фусноти кон текстот. -  
Библиографија кон трудовите

ISBN 978-9989-134-36-4

а) Национална безбедност -- Собири

COBISS.MK-ID 69023237

*MILCON'26 International Scientific Conference is supported by:*



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The Conference is organized by the Military Academy “General Mihailo Apostolski” – Skopje, associated member of the University “Goce Delcev” – Shtip.

The Conference has been immensely supported by the Ministry of Defence and the Army.

# *Preface*

## *Respected readers,*

In front of you is the thematic Proceedings, as a collection of papers presented at the 3rd MILCON'26 Conference, organized in 2026, by the Military Academy "General Mihailo Apostolski" – Skopje, associated member of the University "Goce Delcev" – Shtip.

The objective of the Conference was to gather educators, researchers, and practitioners from different countries to promote scientific exchange and cooperation within all aspects of defense, security, information technology, and related domains.

The papers published in the Proceedings are written by eminent scholars as well as by members of the security system participating in the educational and research process of the army and other security services from different countries. Each paper has been reviewed by experts competent for the field to which the paper is related.

The data and information gained with empirical research, as well as theoretical thoughts and comparative analyses in the Proceedings will give a significant contribution to the development of knowledge in defense and security sciences.

We wish to extend our gratitude to all authors and participants to the Conference, as well as to all those who contributed to, or supported the Conference and the Ministry of Defense and the Army for their immense support of the Conference.

*Skopje, 2026*

## *From the Minister of Defense*

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"The MILCON'26 International Scientific Conference serves as a vital testament to the unbreakable link between scientific innovation and practical defense policies within a rapidly transforming global security environment.

From an institutional and state perspective, the Ministry of Defense highly values this publication as a rigorous repository of evidence-based strategies that directly advance robust strategic cyber resilience, the modernization of military capabilities, and the development of effective responses to sophisticated hybrid threats.

Through deep examinations of civil-military cooperation, smart defense technology, and military diplomacy, these pages provide invaluable insights that support national security interests while solidifying our ongoing contributions to NATO's collective defense framework.

The Ministry proudly endorses this conference, confident that the methodologies and conclusions presented by the contributing domestic and international authors will serve as a lasting resource for the advancement of modern defense systems and the preservation of long-term stability."

*Vlado Misajlovski*  
*Minister of Defense*

## *From the Dean*

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„This volume of the MILCON International Scientific Conference, organized under the auspices of the Military Academy 'General Mihailo Apostolski - Skopje, associate member of University Goce Delcev, Stip', stands as a significant cornerstone of contemporary academic achievements in defense and security.

MILCON has long evolved beyond traditional, isolated boundaries of security, establishing itself as a premier regional conference that bridges the most critical pillars of our contemporary digital and defense ecosystems. The peer-reviewed papers compiled within this edition reflect a comprehensive academic spectrum—spanning from advanced computer networks and systems that form the backbone of modern connectivity, to the cutting-edge integration of artificial intelligence and automated smart risk management frameworks.

In an era of rapid technological acceleration, this volume underscores the critical necessity for cybersecurity, digital forensics, and countermeasures against hybrid threats to tightly interlock with modern military and defense technologies to protect critical infrastructure and drive meaningful digital transformation.

We remain fully confident that the insights and solutions published herein will inspire profound academic discourse and foster impactful, long-term international research collaborations. “

*Prof. Dr.Sc. Col. Nenad Taneski  
Dean, Military Academy "General Mihailo Apostolski" - Skopje*

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## TRANSITIONAL JUSTICE APPROACHES: EXPERIENCES FROM SELECTED POST-CONFLICT AND POST- AUTHORITARIAN COUNTRIES

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**Abstract** - This paper examines different approaches to transitional justice through experiences from selected post-conflict and post-authoritarian countries in Africa, South America, and Europe. The most commonly applied mechanisms of transitional justice are analyzed in order to identify patterns of similarity and divergence across the selected cases. Although these mechanisms share common normative foundations, their implementation varies depending on the political, institutional, and historical contexts in which they are applied. The analysis demonstrates that no single model of transitional justice prevails universally; rather, transitional processes evolve through context-specific combinations shaped by local demands, institutional capacities, and socio-political dynamics.

While both theory and practice reflect a broad range of approaches to transitional justice, and scholarship does not offer a universally agreed classification of models, this paper focuses on restorative, retributive, and institutional reform approaches as analytically distinct and representative frameworks. These approaches are selected for their conceptual clarity and frequent application in practice. This selection does not imply exclusivity but reflects their relevance across different national contexts.

By placing selected experiences within a theoretical framework of transitional justice approaches, the paper provides insight into the determinants of transitional justice design and contributes to the identification of good practices that may guide the development of effective transitional justice processes in post-conflict and post-authoritarian settings.

**Keywords** - Transitional justice, restorative justice, retributive justice, institutional reform, post-conflict and post-authoritarian contexts

### **Introduction**

In societies that have faced armed conflict or authoritarian rule, questions arise about how to address a repressive past and whether violence should be forgotten in pursuit of stability and security. These issues carry legal, political, and ethical implications, regardless of whether the transition is from authoritarianism to democracy or from war to peace.

Transitional justice is a complex and multifaceted field associated with periods of political change and legal responses to past wrongdoings of repressive regimes (Teitel, 2003, p. 69). It comprises a range of processes and mechanisms through which societies address large-scale past abuses in order to ensure accountability, serve justice, and achieve reconciliation (UN Doc. S/2004/616, para. 8). Its fundamental goal is to lay the foundation for building a just, stable, and inclusive society. It implies a comprehensive policy aimed at addressing the legacies of massive and systematic human rights violations and at restoring respect for human rights (de Greiff, 2021, p. 4). Transitional justice approaches include prosecutions, truth-seeking, reparations for victims, institutional reform, and memorialisation (Davis, 2009, p. 11). However, different societies implement these processes in distinct ways, influenced by cultural and religious contexts. This creates a key challenge in balancing international standards with local traditions and practices.

Despite the growing body of literature on transitional justice, there is still a need for analytical work that systematically brings together and interprets diverse national experiences. This paper addresses these gaps by integrating selected experiences into a structured analytical framework that highlights both common patterns and context-specific variations. Focusing on selected post-conflict and post-authoritarian experiences from countries in Africa, South America, and Europe, its aim is to explore how transitional justice approaches are designed and implemented in different contexts. Hence, the paper is guided by the question of whether transitional justice approaches operate as universal models or are primarily shaped by context-specific conditions.

Methodologically, the paper adopts a qualitative case-based analytical approach in order to explore how transitional justice approaches are designed and implemented in practice. The analysis is based on a desk review of relevant academic literature, policy documents, and secondary sources. The selected cases are not intended to provide exhaustive coverage, but rather to illustrate representative experiences that allow for the identification of recurring patterns and context-specific features.

### **Typology of Transitional Justice Approaches**

In practice, approaches to transitional justice vary considerably. The restorative, retributive, and institutional reform approaches elaborated in this paper provide an analytical framework for examining selected experiences from countries that have undergone transitional justice processes. The typology of transitional justice approaches used in this paper is grounded primarily in United Nations policy frameworks and foundational transitional justice scholarship (United Nations, 2004; Teitel, 2003), complemented by literature on transitional justice mechanisms and institutional reform (Sandoval, 2011; de Greiff, 2015; Davis, 2009).

**Table 1.** Typology of transitional justice approaches

<b>Approaches</b>	<b>Goals</b>	<b>Methods/Mechanisms</b>	<b>Challenges</b>
<b>Restorative</b>	Compensation for damages; Restoration of victims' dignity; Reestablishment of social relations.	Reparations; Truth-seeking; Public apology; Rehabilitation; Memorialization.	Weak civil society; Limited resources; Political resistance; Institutional capacity constraints.
<b>Retributive</b>	Determination of criminal responsibility; Punishment of perpetrators.	Judicial proceedings before national, international, or hybrid tribunals.	Dysfunctional judicial system; Pressure from a high number of cases; Consistent adherence to fair trial standards; Need for international support.
<b>Institutional reform</b>	Establishment of professional, accountable, and transparent institutions; Restoration of citizens' trust.	Reform in the judicial, security, and defense sectors; Lustration; Vetting; Constitutional reform.	Long-term process; Need for a flexible strategy; Dealing with systemic abuses.

Table 1 presents an overview of the three main transitional justice approaches: restorative, retributive, and institutional reform. It highlights the key goals, methods/mechanisms, and challenges associated with each approach.

Restorative justice may include financial compensation, public apologies, rehabilitation, memorialization, and other forms of restoring the dignity of victims. In achieving the goals, a particular and frequently practiced mechanism is truth-seeking. It takes place through a truth commission as a non-judicial body organized for a limited time usually set up at a time of transition for the specific purpose of examining serious human rights violations (Sirleaf, 2018, p. 2265). Although first used as a model in Argentina, it is now associated with the processes in post-apartheid South Africa in the 1990s (Teitel, 2003, p. 78). However, the potential benefits of the processes can be limited by various

factors, including a weak civil society, political instability, victim and witness fears about testifying, a weak or corrupt justice system, insufficient time to carry out investigations, lack of public support and inadequate funding (UN Doc. S/2004/616, para. 51).

Individual criminal responsibility for genocide, war crimes, or crimes against humanity is one of the main components of the retributive justice approach. These processes also provide an opportunity for victims to tell their side of the story through testimony. However, the attribution of responsibility must not turn into revanchism, as this would deepen societal divisions and undermine efforts toward recovery. Transitional justice processes can thus potentially undermine resilience when they polarise communities and contribute to entrenching ethnic and social divides (Clark&Ungar, 2021, p. 6). Widespread crime and disregard for legal norms, characteristic of post-conflict societies, can complicate efforts to rely on the criminal justice system (Sirleaf, 2018, p. 2265).

Institutional reform in post-conflict and post-authoritarian transitions may take the form of comprehensive change, including constitutional reform, or targeted sectoral reform, typically in the security, justice, and public administration sectors. In the security sector, reform is an important component of transitional justice, particularly where security agents have committed and continue to commit human rights violations (Davis, 2009, p. 12). Vetting programs should be used to target only those responsible for human rights abuse, rather than political opponents of the new regime or those who may hold different views and beliefs (Van Zyl, 2005, p. 214). If conducted properly, vetting should contribute to building the integrity of the security institution, increasing public trust in it and empowering citizens (Davis, 2009, p. 13). However, resistance from political elites, the risk of selective implementation, and lack of resources are just some of the factors that can influence the effectiveness of institutional reform.

### **Comparative Experiences from Different Regions**

Engaging with the past and transitional justice are unique experiences for every post-conflict and post-authoritarian society, each of which faces specific challenges. Within this process, political will and social cohesion are essential prerequisites for any society undergoing a transition.

Following the overview presented in the previous section, experiences from selected countries across different regions are outlined below.

#### *Transitional Justice Experiences in Africa*

Among the most significant transitional justice processes in the African region is the one in Rwanda. The country experienced genocide in 1994, in which approximately 800,000 people were killed in about one hundred days. Following the genocide, the state faced deep social trauma, a destroyed judicial system, and a large number of suspects. In response to these challenges, multifaceted accountability mechanisms were established.

At the international level, in 1994 the UN Security Council established the International Criminal Tribunal (ICTR) for Rwanda with a mandate to prosecute those responsible for genocide and other serious violations of international humanitarian law. Parallel to this international mechanism, Rwanda established a local court system called Gacaca, which aimed to accelerate justice, establish the truth, and contribute to social reconciliation. However, the Gacaca system was criticized for its lack of legal expertise, selective justice, and the risk of re-victimization of the victims (Clapham, 2012; McKenna, 2025). Rwanda is characterized by a retributive approach to transitional justice, as the focus was placed on judicial proceedings. However, in bridging the gap between communities on the one hand and between the state and its citizens on the other, this approach was combined with mechanisms such as constitutional reform, commemorative services and burial ceremonies involving religious leaders, churches, and local communities. While intended simply to respond to people's needs, these activities were forms of adaptive peacebuilding (Burnet, 2021, p. 100). Participatory and inclusive activities of non-governmental organizations (NGOs) were also implemented; alongside educational processes, including the integration of conflict-related and transitional justice themes into school curricula. Overall, the Rwandan experience illustrates that in the face of mass atrocities, states are often forced to combine formal and informal mechanisms, while the balance between efficiency, fairness, and reconciliation remains particularly sensitive.

In other African countries, transitional justice processes unfolded in contexts significantly different from that of Rwanda. Sierra Leone combined international and national elements to prosecute crimes committed during the civil war through a Special Court, which serves as an example of a hybrid model (Kendall and Staggs, 2005, pp. 2-4; Hybrid Justice, 2024). On the other hand, Republic of South Africa prioritized national reconciliation. The Truth and Reconciliation Commission was established to investigate gross human rights violations committed by the state and liberation movements between 1960 and 1994 (Fombad, 2008). The approach provided individual amnesty in exchange for full disclosure of the crimes committed. It is typical for societies striving to avoid the risks of conducting criminal proceedings as a form of retaliation for past atrocities. While the Commission contributed to national reconciliation, it was criticized for its amnesties, which often meant an absence of punishment, as well as for its reparation programs, which were limited and insufficient for the victims (Amnesty International, 2003, pp. 5-8; Sandoval, 2011, pp. 5-7).

#### *Transitional Justice Experiences in South America*

In the South American countries, Argentina demonstrated a decisive approach to addressing past mass human rights violations following the fall of the military dictatorship in 1983. An initiative was launched to establish accountability for approximately 30.000 enforced disappearances and other serious human rights violations committed during the so-called „Dirty War” (1976-1983). Restorative justice mechanisms combined with trials,

amnesties and retrials dominated in Argentina. The mechanisms included fact-finding regarding victims, reparations programs involving financial compensation, healthcare, and social benefits for victims and their families, as well as memorialization initiatives. The dominant mechanism was the National Commission on the Disappearance of Persons (CONADEP), which, in its 1984 report *Nunca Más* (Never Again), identified 8,960 disappeared persons and 365 secret torture centers (Chen, 2021, p. 32). The established facts served as the basis for initiating judicial proceedings, leading to the 1985 conviction of top military leaders. Amnesty laws passed later were eventually overturned in the early 2000s, and criminal proceedings were reopened. This experience from Argentina shows that justice can be achieved even after decades of impunity (KU Leuven, 2020; Crenzel, 2011, p. 3).

The restorative transitional approach, with a focus on fact-finding and accompanied by institutional reform, reparations programs, public apologies, and memorials, is also characteristic of other South American countries. In Chile, the process began with the fall of Augusto Pinochet, who led the military dictatorship and systematic repression from 1973 to 1990. In 1990, the National Commission for Truth and Reconciliation (Rettig Commission) documented more than 2,200 cases of deaths and enforced disappearances resulting from human rights violations. In 2003, the National Commission on Political Prisoners and Torture (Valech Commission) was established, which recognized over 28,000 individuals as victims of political imprisonment and torture in an official report and another additional report published in

2004 and 2005 (United Nations Human Rights Council, 2013, para. 10). The Rettig and Valech Commissions were significant in recognizing victims but were criticized for their limited mandate, insufficient reparations, and selective approach to different categories of victims. Additionally, Chile chose to gradually reform the 1980 Constitution to remove authoritarian enclaves over time. Criminal prosecutions were limited for a long time due to the 1978 Amnesty Law. However, as in Argentina, in the early 2000s the Supreme Court in Chile enabled criminal proceedings against former members of the secret police (DINA), as well as against military officials.

Transitional processes in Colombia unfolded in the context of a complex internal armed conflict involving paramilitary groups, state armed forces, guerrilla groups, drug cartels, and criminal organizations. The conflict resulted in more than 260,000 deaths, over 80,000 disappearances, and more than eight million displaced persons. A central role is played by the Special Jurisdiction for Peace, a hybrid judicial mechanism mandated to prosecute the most serious violations of international law and human rights, offering alternative sentences for perpetrators who fully admit guilt. This reflects Colombia's emphasis on truth-seeking and reconciliation. The 2016 peace agreement signed in Cuba between the Colombian government and the Revolutionary Armed Forces of Colombia (FARC) marked a key milestone, although violence and armed group activity continued in the post-agreement period (Weber, 2021, pp. 187-191). In 2022, Colombia's Truth

Commission published its final report on the causes of the armed conflict, while the Unit for the Search of Missing Persons had already been established as part of the transitional justice system.

The process of transitional justice in Paraguay began after the fall of the long-standing authoritarian regime and systematic repression. Following the example of other South American countries, a Truth and Justice Commission in 2008 documented over 20,000 victims, including cases of disappearances, torture, and executions. Although the report represented a significant step in the official recognition of victims, judicial proceedings in Paraguay remained few and often ineffective, resulting in continued impunity for the perpetrators of the most serious crimes. The experience of Paraguay indicates that truth commissions, without adequate support from the judicial system, have a limited transformative effect.

Mexico provides a specific example of the transitional justice process in a state that has faced enforced disappearances, extrajudicial executions, and torture since the mid-2000s. The country faces continuous violence linked to organized crime, state corruption, and the militarization of the security sector. Efforts toward transition and societal stabilization are made occasionally, depending on the circumstances. These efforts involve mechanisms such as ad hoc truth commissions, legislative reform, and increased participation from international bodies. The transitional processes in Mexico demonstrate that such efforts are not always tied to a change in an authoritarian political regime or the end of a conflict, but can instead evolve as a gradual process of institutional transformation. For instance, in 2018, a Truth Commission was initiated for the Ayotzinapa case, involving the disappearance of 43 students in 2014. However, the commission's work was hindered by state institutions, prompting Amnesty International to express concern that insufficient transparency and cooperation from authorities undermine effective truth-seeking and accountability processes (Amnesty International, 2022; Amnesty International, 2023).

#### *Transitional Justice Experiences in Europe*

The experiences with transitional justice in Europe are diverse and pertain to the processes in societies that have faced war, military dictatorship, or authoritarian regimes. In this historical context, the fall of the Berlin Wall and the reunification of Germany are considered a pivotal starting point, as they raised the question of how to address the legacy of systematic human rights violations. The German approach combined several components of transitional justice, including judicial proceedings, lustration, the opening of the secret police archives, and the implementation of institutional reform. This example is often cited as an illustration of a gradual and institutionally oriented approach for dealing with the past, in which the focus was on truth-seeking, memorialization, and the democratization of society.

In Spain, the transition following the death of Francisco Franco was marked by the so-called „Pact of forgetting” (Pacto del Olvido), where the 1977 Amnesty Law effectively prevented criminal prosecution for crimes committed during the dictatorship. For a long time, this approach was considered a prerequisite for stable democratization, though it later faced criticism for failing to provide justice and recognition for victims. A similar approach was applied in Portugal after the 1974 revolution, where mechanisms for reparations and review of the Salazar regime were established, but without mass judicial trials. In contrast, Greece, following the fall of the military junta in 1974, judicial proceedings were conducted against high-ranking military leaders, representing an example of a combined approach of criminal justice and political reconciliation, followed by efforts to ensure institutional stability.

In Poland, the Czech Republic, and Hungary, following the fall of communist regimes, lustration laws were introduced to restrict the participation of former communist officials and security-service collaborators in new democratic institutions. At the same time, criminal prosecutions remained cautious and limited, reflecting broader efforts to balance accountability with political stability during democratic transition.

In the Balkan states, transitional justice mostly developed in a post-war context. In Bosnia and Herzegovina, Croatia, and Serbia, war crimes trials were conducted at both international and national levels. Parallel to these, reparations programs, truth-seeking commissions, and memorialization initiatives were established. The results of the implementation of these mechanisms were varied. Central to transitional justice in Bosnia and Herzegovina was the constitutional reform that emerged from the Dayton Peace Agreement, which established a complex power-sharing system among ethnic groups. While designed to end the conflict and ensure political representation, this constitutional framework is often criticized for entrenching ethnic divisions rather than overcoming them. Attempts to establish a comprehensive state-level truth commission were unsuccessful, leading to fragmented unfolding of the processes of truth-seeking, carried out through judicial proceedings, non-governmental organizations, and international projects. A key international accountability mechanism was the International Criminal Tribunal for the former Yugoslavia (ICTY), established in 1993 by the UN Security Council. The Tribunal had a mandate to prosecute those responsible for serious violations of international humanitarian law. Parallel to the processes in Bosnia and Herzegovina, in Serbia and Croatia the emphasis was placed on the judicial proceedings against perpetrators of war crimes, but restorative measures were also undertaken, such as memorial activities, educational programs, and limited reparations.

In the Republic of Macedonia, transitional justice is primarily associated with the 2001 internal armed conflict, which raised serious questions regarding interethnic relations and accountability for violations of international humanitarian law. In the post-conflict period, several cases were placed under the jurisdiction of the ICTY, reflecting the internationalization of accountability efforts. However, most of these cases were

subsequently returned to the domestic judicial system, while the legal and political framework was further shaped by an authentic interpretation of the Law on Amnesty in 2011, which extended amnesty to perpetrators. This approach was likely driven by objectives of stabilization and reconciliation, but it has been criticized for limiting criminal accountability and for the absence of a comprehensive official establishment of the facts concerning the conflict.

### **Synthesis of Transitional Justice Approaches**

A review of the experiences from selected countries in Africa, South America, and Europe shows that diverse approaches have been applied and that no unified model of transitional justice exists. These approaches are flexible and adapted to the specific societal contexts of different states. Although transitional justice processes have traditionally focused on reparations and truth-seeking efforts, international judicial responses to organized violence have significantly developed. This was particularly evident in countries with substantial international intervention, such as Bosnia and Herzegovina and Rwanda.

Truth commissions remain among the most widely recognized transitional justice mechanisms. However, it is evident that over recent decades many countries have also turned to locally tailored forms of justice. Victim reparations, despite being essential for recognition and redress, have often remained limited or selective. Considerably less attention has been given to mechanisms aimed at preventing the recurrence of mass violence, repression, and human rights violations.

In the European context, the experiences of Eastern European countries in particular, demonstrate that institutional reform and lustration can contribute to democratization, while also raising questions of selectivity, privacy, and impunity. Experiences from the Balkan countries show that the dominance of judicial processes, without a balanced combination of other mechanisms, rarely leads to a full and sustainable confrontation with the past.

The transitional justice approach in Colombia is often considered successful due to its integrated and innovative nature. However, it remains one of the longest-running and most complex cases of internal armed conflict. It faces challenges such as procedural complexity, political polarization, and security risks for victims and witnesses. On the other hand, Mexico's experience expands the traditional framework of transitional justice by applying its mechanisms in a context of ongoing human rights violations. This significantly affects the process and limits its outcomes. Taken together, the experiences of selected South American countries, correspond to Thomas Carothers' concept of a "grey zone" (Carothers, 2002, pp. 9-10), characterized by incomplete democratization, weak institutions, corruption, and persistent violence. At the same time, these cases illustrate that transitional justice processes may continue to evolve gradually, even decades after authoritarian rule or in the absence of a clearly defined political transition.

The African experience shows involvement in truth-seeking and criminal accountability, as well as the gradual strengthening of institutions such as police, security services, and courts. The development of accountability mechanisms and the implementation of justice and reparation programs are also significant. The experiences show that locally driven processes involving the participation of religious leaders and civil society organizations, as in Rwanda, can have positive effects. Without such inclusiveness, there is a risk that transitional justice processes will be perceived as externally imposed and lose legitimacy. In addition, cultural and social measures play a crucial role in raising awareness and preventing the recurrence of large-scale human rights violations.

The experiences examined in this paper suggest that the effectiveness of transitional justice approaches cannot be assessed through a single criterion. Success may be understood in terms of accountability through the prosecution of perpetrators, reconciliation through the restoration of social cohesion and trust, or institutional legitimacy through increased public confidence in state institutions. From this perspective, retributive approaches appear particularly effective in promoting accountability, restorative approaches contribute more directly to reconciliation, while institutional reform approaches play a crucial role in strengthening institutional legitimacy and preventing recurrence. The analyzed cases indicate that no single approach consistently outperforms the others. Rather, the most effective transitional justice processes combine different approaches and adapt them to specific political, social, and historical circumstances.

### **Conclusion**

The analysis presented in this paper demonstrates that transitional justice processes are highly context-dependent and involve diverse combinations of judicial, restorative, institutional, and societal mechanisms. The processes of societal reconciliation and institutional transformation may, in some contexts, unfold relatively quickly, while in others they extend over decades and remain subject to political and public contestation. Although every context is unique, societies must address the same fundamental questions of whether, when, and how to embark on a path toward a peaceful, just, and inclusive future. There is no doubt that the transition process is particularly challenging in deeply divided societies and may generate competing narratives, further complicating long-term reconciliation. In practice, most transitional justice models combine elements of the three mentioned approaches (restorative, retributive, and institutional reform). However, they often lean toward the restorative approach, particularly where mass criminal prosecution is politically or institutionally unfeasible. In such contexts, amnesty, forgiveness, and reconciliation are frequently prioritized over trials. They are seen as contributing to the restoration of social cohesion, whereas punishment may deepen divisions. This approach can reduce the risk of revenge and renewed cycles of violence.

Restorative justice therefore plays a significant role in low-intensity conflicts and individual-level reconciliation processes. However, in cases of systemic or mass atrocities,

such as those in Rwanda and Bosnia and Herzegovina, it is insufficient on its own to address the full range of transitional justice challenges, making a context-sensitive, combined approach necessary. Thus, based on different experiences and their interaction with post-conflict efforts, selected African countries illustrate different transitional justice models combining international and domestic mechanisms, restorative approaches, and hybrid accountability frameworks.

The African experience highlights the importance of combining truth-seeking and criminal accountability with the gradual strengthening of state institutions and involving civil society and community actors. In South America, transitional justice processes have often prioritized truth commissions, frequently complemented by reparations and, in some cases, subsequent judicial proceedings. European countries, despite their diversity, have generally emphasized institutional reform and amnesty-based approaches over extensive retributive justice mechanisms. The notable exception is the former Yugoslav countries, where international criminal justice played a central role. Each of these approaches carries both advantages and limitations, most often related to implementation, political circumstances, institutional capacity, and the ability to balance accountability and reconciliation. The availability of resources, long-term sustainability, public legitimacy, the broader social context, as well as the complexity of post-conflict social reconciliation, also significantly affect their effectiveness.

Taking all of the above into consideration, it can be concluded that transitional justice strategies must be adapted to local conditions and developed through inclusive processes of local consultation. Without such inclusiveness, particularly when processes are externally imposed or incompatible with local traditions, outcomes risk remaining partial or may deepen societal divisions. Contemporary conflicts also demonstrate the continuing relevance of transitional justice. The ongoing war in Ukraine has renewed international attention to questions of accountability, reparations, institutional reform, and long-term reconciliation. Future transitional justice processes are therefore likely to place greater emphasis on integrated approaches that combine criminal accountability with victim-centered measures and institutional transformation, while responding to the specific needs and expectations of affected societies.

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