

The Urgency of Establishing Truth and Reconciliation Commission (TRC) To Resolve Gross Human Rights Violations in Aceh, Indonesia

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Abstract

Aceh has a history of prolonged armed conflict, characterized by gross human rights violations. The conflict between the Government of Indonesia and the Free Aceh Movement (GAM) was resolved in Helsinki, Finland, through the Memorandum of Understanding (MoU). The Helsinki Memorandum of Understanding included the establishment of the Truth and Reconciliation Commission (Aceh TRC) to address human rights abuse in Aceh. However, the government opted for a non-judicial approach, focusing on restoring victims' rights without uncovering the truth about perpetrators. This approach, which is consistent with the fundamental principles of addressing human rights abuses, has faced opposition from victims and their families because of the lack of accountability for perpetrators. Although established following relevant laws, the Aceh TRC has been shown to be ineffective in addressing serious human rights violations.

Keywords: Truth and Reconciliation Commission, Human Rights, Human Rights Violations, Aceh TRC.

INTRODUCTION

One of the terms outlined in the Memorandum of Understanding (MoU) between the Government of Indonesia and the Free Aceh Movement (GAM) in Helsinki, Poland, stated that cases of serious human rights violations in Aceh will be handled extrajudicially (non-litigation) through the Aceh Truth and Reconciliation Commission (TRC). The Aceh TRC is an independent entity established to uncover the truth behind significant past human rights violations and facilitate reconciliation efforts (J Edelstein and Ignatieff 2002).

Point 2.3 of the Helsinki Memorandum of Understanding specifies the establishment of the TRC in Aceh by the Indonesian Truth and Reconciliation Commission. This body is tasked with formulating and determining reconciliation efforts, as outlined in the Memorandum of Understanding on Peace between the Government of the Republic of Indonesia and the Free Aceh Movement (GAM) on August 15, 2005 (Kadir, 2015). Subsequently, in compliance with the Helsinki MoU, the government enacted Law No. 11/2006 for the Aceh Government and Law No. 17/2013 for the Aceh TRC. These regulations provide a legal framework for establishing a TRC in Aceh.

The formation of the Aceh TRC was explicitly conducted by the Indonesian Truth and Reconciliation Commission, as stated in the Helsinki MoU and Aceh Government Law. Legal issues emerged when the Constitutional Court revoked Law No. 27 of 2004, which was the basis for establishing the TRC in Indonesia. In the decision for Case No. 006/PUU-IV/2006, the Constitutional Court declared Article 27 of Law No. 27 of 2004, stating that "Compensation and rehabilitation as intended in Article 19 can be provided if the amnesty request is granted," was deemed to conflict with the 1945 Constitution (Taufik, 2017). As a result, the decision has led to the revocation or abolishment of all provisions of Law No. 27 of 2004 regarding the Truth and Reconciliation Commission, as the founding spirit of the Aceh TRC institution was centered on providing compensation, rehabilitation, and amnesty to victims and perpetrators of serious human rights violations in Indonesia (Schiller, 2011).

The effectiveness of the Truth and Reconciliation Commission (TRC) in Indonesia, particularly concerning its alignment with the 1945 Constitution, is being questioned, casting doubt on the feasibility of establishing a TRC in Aceh, as outlined in the Helsinki Memorandum of Understanding (MoU) by the Indonesian

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government. In the absence of a central TRC, the Aceh government created an institution under specific legal frameworks. However, its position is considered weak because of the lack of a robust legal foundation even 18 years after the signing of the Helsinki MoU. As a result, the Aceh TRC struggled to facilitate reconciliation efforts and address serious human rights violations in the Aceh region.

This legal dispute prompted the Indonesian government to employ a non-judicial approach to address serious human rights violations in Aceh, focusing on restoring the rights of victims without criminally responsible perpetrators. This non-judicial approach to grave human rights violations in Aceh is outlined in Presidential Instruction (INPRES) No.2 of 2023, which pertains to the implementation of recommendations for the non-judicial resolution of human rights violations. The Indonesian government adopted a different approach to addressing human rights violations in Aceh by implementing the truth and reconciliation model outlined in the Helsinki Memorandum of Understanding, rather than relying on traditional judicial processes. This study aims to assess the effectiveness of this approach and the implementation of recommendations for non-judicial resolutions in Aceh.

METHODS

This study uses empirical legal research. This empirical legal research method combines a normative legal approach with additional empirical elements (Leeuw, 2015). The empirical legal research method refers to normative legal provisions (laws), legal principles, legal theory, and law of action in all legal events in a society (Diantha, 2017). Empirical legal research explores the normative dimensions of legal matters (i.e., the law, as stated in official documents) and the practical application of legal statutes to address cases of significant human rights violations in the past, mainly through the Aceh TRC. This includes efforts to implement non-judicial resolution programs for human rights violations in Aceh and operationalize legal regulations related to these issues.

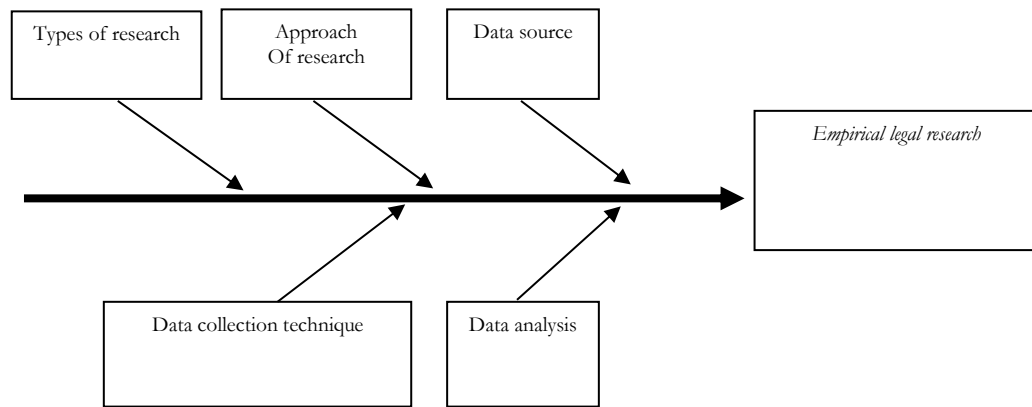


Figure 1. Empirical Legal Research Methodology

Several approaches can be used in research law, such as statutes and case approaches (Abdul Kadir, 2015). The study used a legal methodology to gather relevant legal material on the role of the Aceh TRC. The study focused on analyzing incidents of human rights abuses in Aceh using a case study approach based on documented evidence from the TRC. Primary and secondary data were collected through library research, observations, and interviews. Primary data were obtained through in-depth observations and interviews with relevant parties, whereas secondary data consisted of legal materials obtained from literature studies and various libraries (Sonata, 2014; Sunggono, 2005). Furthermore, this research also used secondary data as supporting data. Secondary data consist of primary, secondary, and tertiary legal materials relevant to the research to be carried out (Nurudin, 2018). This legal material comes from studies in the literature or documents obtained from various libraries that contain references related to this research.

RESULTS AND DISCUSSION

The Position of the Aceh TRC in Indonesia

The Truth and Reconciliation Commission is an experimental response to a country's political transitions. Since its first appearance in Argentina and Uganda in the mid-1980s, the TRC has become an international phenomenon for resolving serious human rights violations (Akbar, 2017). More than 20 countries have chosen to establish a TRC to address past human rights violations. Although some have achieved notable success, it is essential to note that others still oppose their existence. Several countries have used the TRC as a formula to resolve cases of serious human rights violations based on government regulations and laws (Zvobgo, 2020). There are also those formed by nongovernmental organizations, such as El Salvador by the United Nations and Uruguay, Rwanda, and Brazil, initiated by nongovernmental organizations (NGOs) (Ilyasa et al., 2020).

The four primary character elements of the Aceh TRC are as follows:

Initially, the investigation was directed toward previous criminal activities.

The scope of this investigation encompasses particular crimes and the ability to delineate widespread human rights violations within a specific timeframe.

It has a defined duration and is typically completed after finalizing a truth-seeking report.

The TRC is mandated to obtain information from any establishment and request protection measures from individuals who provide testimony.

Approximately 20 TRCs have been established in various countries. Each commission possesses unique nomenclature, mandate, and authority. Certain commissions are tasked with addressing a particular type of human rights violation. For example, TRCs in Chile and Argentina are mandated to address extrajudicial executions and disappearances carried out either by the state or armed resistance groups (Abdurahman & Susanto, 2016). Most of the world's TRCs have extensive mandates that encompass a wide range of gross human rights violations, as observed in South Africa, Guatemala, and El Salvador (Bhakti, 2018).

The TRC in Indonesia was established under Law No. 27 of 2004 but was later nullified by the Constitutional Court through Decision No. 6/PUU-IV/2006. The formation of the TRC Institution in Indonesia was based on various laws and regulations, such as MPR Decree No. V/MPR/2000, Law No. 26 of 2000, Law No. 2 of 2021, and Law No. 11 of 2006. However, in 2006, NGOs and victims of human rights abuses challenged TRC law before the Constitutional Court, leading to the court nullifying the law entirely in response to the petitioner's requests (Komnas HAM Republik Indonesia, 2021).

The revocation of the law has implications for regions such as Papua and Aceh, where the TRC framework is governed by specific legislation (Salam & Suhartono, 2020). Law No. 21/2001 on Special Autonomy for Papua Province mandates the establishment of a TRC in Papua to elucidate its history and promote national unity (Rakia et al., 2021). Shortly before the repeal of Law No. 27 of 2004 concerning the TRC, the government implemented Law No. 11 of 2006 regarding the Governance of Aceh, which included provisions for the formation of a TRC in Aceh. Article 229 (1) of the Law on the Governance of Aceh states that "To pursue truth and reconciliation, a TRC is hereby established in Aceh."

The TRC in Aceh was established in accordance with the Helsinki Peace Agreement between the Indonesian Government and the GAM. The human rights section of the agreement specifies that the Indonesian TRC is responsible for implementing reconciliation measures in Aceh (Miko et al., 2020). However, the TRC in Aceh is limited by the regulations of Law No. 27/2004 governing the National TRC, limiting its operational effectiveness. To accelerate the national reconciliation process, especially in Aceh and Papua, enactment of a new TRC law is crucial.

Resolving Human Rights Violations Through Non-Judicial Mechanisms

There are two primary mechanisms for resolving conflicts globally: litigation, which involves resolving disputes through the court system; and non-litigation, which involves settlement through out-of-court mechanisms, also

known as alternative dispute resolution (ADR). Litigation is a formal process that involves a court or official institution, follows specific procedural rules, and gives the institution the authority to decide on a case. It is a legally regulated mechanism used when the parties in dispute cannot resolve their issues independently, making the court the final option for resolving such matters. On the other hand, alternative dispute resolution methods aim to resolve differences between parties without involving the court. These methods include mediation, consultation, conciliation, negotiation, and expert evaluations based on sincerity and awareness. If these alternative mechanisms do not lead to a resolution, the court remains the ultimate recourse for the parties involved (Hatta, 2019).

These two mechanisms also address serious human rights violations in Indonesia while maintaining the principles of fairness and justice. Agus Raharjo identified three primary methods for addressing severe human rights abuses as follows (Raharjo, 2007):

Let go of the incident and progress in life;

Resolution Through Legal Proceedings

Acknowledging past events to a certain extent, emphasizing the pursuit of truth, and offering restitution and support to victims through the establishment of a TRC while seeking justice from primary offenders. Nunik Nurhayati also indicated that three model mechanisms are used to address cases of severe human rights violations in various countries around the world (Nurhayati, 2017):

The "Forgive and Forget" model may be the preferred approach for offenders, advocating for forgoing legal action and overlooking past transgressions. However, this position conflicts with the desires of the victim's community. Moreover, this model risks establishing a negative precedent for the future, perpetuating a culture of impunity and lacking a deterrent impact.

The "Never to forget, never to forgive" approach entails prosecuting past events, with perpetrators being tried and sentenced if found guilty. However, this model poses risks, because it can provoke resistance from the offender and potentially impede peace.

The "Never to forget but to forgive" model initially acknowledges the offender's faults, presents the truth, and subsequently offers forgiveness. Thus, this approach can be regarded as a compromise.

The decision to pursue a non-judicial approach to addressing human rights violations reflects a "forgive and forget" the conflict resolution model. This approach perpetuates impunity and lacks a deterrent effect by bypassing the formal legal processes. According to Nurkholis, non-judicial settlements must adhere to key principles in order to address gross human rights violations. These principles include rejecting impunity and establishing four crucial pillars: the right to justice, right to truth, right to reparation, and guarantee of non-repetition (Nurkholis, 2015).

Presidential Instruction (INPRES) No.2/2023 prioritizes victims of severe human rights violations in Indonesia, as identified by the KOMNAS HAM. The government's non-judicial resolution process aims to address the needs and rights of individuals impacted by significant human rights abuse. While acknowledging past human rights violations and expressing regret, the government is committed to resolving these issues in accordance with the existing laws and regulations. The focus is on providing justice and support for the victims rather than solely punishing the perpetrators, demonstrating a commitment to upholding human rights and addressing historical injustices (Thea, 2023).

Many parties, particularly individuals who have previously experienced human rights abuses, oppose the non-judicial process pursued by the government. Although this is not a formal judicial procedure, the government is still expected to uphold universally accepted principles. These principles include the state's responsibility to address human rights violations by respecting the right to information (the right to know) as the basis for providing compensation to victims (the right to reparation), ensuring accountability through legal measures to prevent future violations, and advocating institutional reforms (Putra & Irwansyah, 2018).

Article 2, paragraph (3) of the International Covenant on Civil and Political Rights stipulates that states must compensate victims of human rights violations. This includes ensuring effective redress for victims, regardless of whether state officials committed violations. The article also required states to allow civil action seeking compensation for violations classified as crimes against humanity. It is often argued that no court verdict can adequately address the gravity of such crimes.

The Urgency of Establishing Aceh TRC to Resolve Past Cases of Serious Human Rights Violations

The government's mechanism for addressing severe human rights violations focused on 12 cases identified by the National Human Rights Commission (KOMNAS HAM). These cases include the 1965-1966 incident, the mysterious shooting incident from 1982-1985, the Talangsari incident in Lampung in 1989, and other incidents such as the Rumoh Geudong incident and the Pos Sattis in Aceh in 1989. Other cases recognized by the government included forced disappearances in 1997-1998, the May Riots of 1998, the Trisakti and Semanggi I-II Incidents in 1998-1999, the Murder of Witchcraft Witches in 1998-1999, the Simpang KKA Incidents in Aceh in 1999, the Wasior Incidents in Papua from 2001-2002, the Wamena Incident in Papua in 2003, and the Jambo Keupok Incident in Aceh in 2003. These cases are being investigated and addressed, with a focus on resolving serious human rights violations.

Presidential instruction does not fully address serious human rights violations in Aceh by using non-judicial mechanisms. Three such violations, including the Rumoh Geudong and Pos Sattis incidents in 1989, the Simpang KKA incident in 1999, and the Jambo Keupok incident in 2003, were designated for resolution by non-judicial means. However, this approach goes against the Helsinki MoU directive, which states that significant human rights abuse in Aceh must be resolved through the TRC.

The Aceh government issued laws (Law No.11 of 2006 and Aceh Qanun No. 17 of 2013) to establish the Aceh Truth and Reconciliation Commission (TRC) in line with the Declaration of Helsinki. Despite criticism, the TRC's primary focus is to uncover hidden truths about the Aceh conflict and to provide reparations to victims rather than to seek revenge. The institution aims to protect victims' rights and shed light on past wrongdoings without placing sole responsibility on the perpetrators of human rights violations. Its purpose is to promote reconciliation and acknowledge the suffering of those affected by conflict in Aceh.

Aceh TRC cannot replace the judiciary because it lacks the authority to deliver justice. This is mainly due to its limitations in detaining individuals suspected of committing severe human rights violations and the lack of a mandate to prosecute perpetrators. Instead, the Aceh TRC functions as an informant, focusing on collecting and strengthening data related to serious human rights abuse. The information gathered is then recommended to legal institutions to handle formal judicial processes. Therefore, the Aceh TRC's role focuses mainly on facilitating the legal resolution of human rights violations, rather than directly administering justice. The Chairperson of the Aceh TRC, Muhammad Idham, stated the following:

The role of the Aceh TRC remains pertinent and should accelerate the resolution of serious human rights violations in Aceh. Although the central government promptly pledged to address such violations using non-judicial means, the position of the Aceh TRC persists because its resolution mechanism is non-litigious, aligning with its designated duty to address past human rights violations in Aceh through non-judicial methods. However, regulations must be established to align the position and function of the Aceh TRC with the non-judicial resolution of serious human rights violations.

Nonjudicial mechanisms, such as variants of the truth and reconciliation model, are often utilized to address serious human rights violations. In contrast to the completion model, which focuses solely on restoring victims' rights without addressing perpetrators, the truth and reconciliation model aims to uncover and address mistakes, violations, crimes, and the individuals responsible. Victims are absolved and forgiven through this process and their rights are reinstated. The government approved and developed this model to address historical violations of human rights.

Consequently, the resolution of grave human rights violations from the past is not pursued through judicial proceedings, as stipulated in Law No. 26 of 2000 related to Human Rights Justice. The formation of a TRC in

Aceh became an option in the Helsinki Memorandum of Understanding to resolve cases of serious human rights violations (Hatta, 2019). It appears that the Indonesian government employs the three models mentioned above to address cases of significant human rights violations in various regions of Indonesia, including instances of severe human rights abuse in Aceh. As stated by Aceh TRC Commissioner Tasrijal,

The Indonesian government's approach to resolving serious human rights violations in Aceh is inconsistent. Initially, it emphasized judicial settlement, resulting in Law No.26/2000 on Human Rights Courts. However, the government later shifted to a model that focused on revealing the truth and forgiving victims in collaboration with the Free Aceh Movement (GAM). This led to the TRC in Aceh, which operates on the principle of "forgive, but not forget.

The Aceh TRC focuses on fulfilling victims' rights to the truth, addressing their needs and desires, and protecting the rights of victims and their families. The emphasis is on uncovering facts rather than speculation, with truth-telling grounded in integrity and honesty, including discussions of sensitive topics. While the specific approach to addressing human rights violations in Aceh is not clearly defined, the Aceh TRC represents a new regional concept, as past offenses have traditionally been resolved by judicial and customary means. Furthermore, Islam does not provide a standardized method for handling such cases, making the acceptance of a new model contingent on adherence to fundamental principles. The Aceh TRC has the flexibility to adopt various models within the framework of truth and reconciliation as long as they do not contradict Islamic principles. The chairperson of the Aceh Traditional Council held the following perspective:

Reconciliation is conducted in an attempt to restore harmonious social and community relationships. This process is carried out through traditional approaches, such as *sayam*, *peusijek*, peacemaking, or other regional or tribal methods. The objective of reconciliation is to eliminate lingering grudges and mutual suspicion, exemplified by practices such as *peumat jaroe* (handshaking) and forgiveness between the perpetrator and victim. It is important to note that the victim may choose not to participate in the reconciliation process, and this decision will not impact the reparations that they are entitled to receive.

The resolution of conflicts in accordance with Acehnese customs and the preservation of traditional life and values were regulated by Aceh Qanun No. 9 of 2008. Traditional institutions are responsible for carrying out their duties as dispute-resolution bodies independent of the court system. Customary settlements can be achieved through various methods, such as *Suloh*, *Peusijek*, *Peumat Jaroe*, and custom-based conflict resolution processes, which are deeply ingrained in Acehnese society. This tradition represents a democratic approach to conflict resolution that avoids bloodshed and retribution in vertical and horizontal disputes (Ubbe, 2013).

The Aceh Truth and Reconciliation Commission (TRC) aims to address serious human rights violations by following the principles of statutory, customary, and Islamic law as outlined in Aceh Qanun No. 17 of 2013. Article 2 of this law emphasizes the need for the TRC to operate independently, impartially, and in accordance with Islamic principles and local customs. The Commission must also uphold democratic values, ensure justice and equality for all parties involved, and comply with legal regulations to guarantee legal certainty. The TRC's core objective is to promote reconciliation between perpetrators and victims of human rights abuse, while providing comprehensive reparations to those affected. This approach reflects the fundamental principles of the Aceh TRC, which prioritizes peacebuilding and fostering dialogue between the conflicting parties.

CONCLUSION

The Indonesian government and Free Aceh Movement (GAM) agreed to address serious human rights abuses in Aceh through the Truth and Reconciliation Commission, as described in the Memorandum of Understanding in Helsinki, Finland, in August 2005. Aceh TRC focuses on uncovering the truth about historical human rights violations, promoting peace, facilitating reconciliation between perpetrators and victims, and recommending reparations based on universal standards for victims' rights. Currently, the Indonesian government is addressing these violations through nonjudicial means, prioritizing the restoration of victims' rights without disclosing perpetrators' culpability.

Presidential Instruction (INPRES) No. 2 of 2023 in Aceh mandates the resolution of at least three cases of gross human rights violations through non-judicial mechanisms, although it is not universally applied. The Revocation of Law No. 27/2004 on the Truth and Reconciliation Commission created challenges in resolving such cases in Aceh. Despite efforts to establish the Aceh TRC according to relevant laws, including Aceh Qanun No. 17 of 2013, the Commission has been ineffective in addressing gross human rights violations. As a result, no cases were successfully resolved using Aceh TRC.

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REFERENCES

- Abdul Kadir, M. (2015). *Hukum Dan Penelitian Hukum*. PT. Citra Aditya Bakti.
- Abdurahman, A., & Susanto, M. (2016). Urgensi Pembentukan Undang-Undang Komisi Kebenaran dan Rekonsiliasi di Indonesia dalam Upaya Penuntasan Pelanggaran HAM Berat di Masa Lalu. *Padjadjaran Journal of Law*, 3(3), 509–530. <https://doi.org/http://dx.doi.org/10.22304/pjih.v3.n3.a4>
- Akbar, K. (2017). Politik Hukum Pembentukan Komisi Kebenaran dan Rekonsiliasi Aceh. *Lex Renaissance*, 2(2), 195–212.
- Bhakti, I. N. (2018). Beranda perdamaian: Aceh tiga tahun pasca MoU Helsinki. P2P-LIPI.
- Diantha, I. (2017). Metodologi Penelitian Hukum Normatif dalam Justifikasi Teori Hukum. *Prenada Media*.
- Edelstein, J., & Ignatieff, M. (2014). *Truth And Lies: Stories From The Truth And Reconciliation Commission In South Africa*. Granta Publications. <https://books.google.co.id/books?id=HZGdAwAAQBAJ>
- Hatta, M. (2019). *Kejahatan Luar Biasa (Extra Ordinary Crime)* (Zulfan, Ed.). Unimal Press.
- Ilyasa, R., Raashad, F., & Simatupang, J. (2020). Urgensi Rekonstruksi Pembentukan Komisi Kebenaran Dan Rekonsiliasi: Menghapus Kebijakan Amnesti dan Mendesain Abolisi. *Khatulistiwa Law Review*, 1, 148–162. <https://doi.org/10.24260/klr.v1i2.102>
- Kadir, M. (2015). The Urgency Of Establishing The Truth And Reconciliation Commission In Aceh: Against National Amnesia. *Kanun Jurnal Ilmu Hukum*, 67(18), 495–509. <https://ssrn.com/abstract=2929785>
- Komnas HAM Republik Indonesia. (2021, December 22). Pembentukan KKR Mencuat Harapan Penyelesaian Kasus Pelanggaran Ham Yang Berat. *Komnas HAM RI*.
- Leeuw, F. L. (2015). Empirical Legal Research: The Gap between Facts and Values and Legal Academic Training. *Utrecht Law Review*. <https://doi.org/10.18352/ulr.315>
- Miko, A. J., Madjid, M. A., & Astawa, N. (2020). Peran Komisi Kebenaran Dan Rekonsiliasi (KKR) Aceh Dalam Membangun Positive Peace Di Aceh (The Role of The Aceh Truth And Reconciliation Commission (TRC) In The Development of Positive Peace In Aceh). *Jurnal Damai Dan Resolusi Konflik*, 6(2), 168–188.
- Nurhayati, N. (2017). Quo Vadis Perlindungan Hak Asasi Manusia Dalam Penyelesaian Pelanggaran HAM Berat Masa Lalu Melalui Jalur Non Yudisial. *Jurnal Jurisprudence*, 6(2), 149. <https://doi.org/10.23917/jurisprudence.v6i2.3012>
- Nurkholis. (2015, June 11). Upaya Penyelesaian Kasus-Kasus Pelanggaran HAM yang Berat. *Makalah Pada Seminar Penyelesaian Perkara Pelanggaran HAM*.
- Nurudin. (2018). Hubungan media: konsep dan aplikasi. *Raja Grafindo Persada*.
- Putra, M. Y., & Irwansyah. (2018). Penyelesaian Non-Yudisial Terhadap Pelanggaran Ham Berat Masa Lalu: Tinjauan Sosiologi Peradilan. *Tanjungpura Law Journal*, 2(1), 1–15. <https://doi.org/https://dx.doi.org/10.26418/tj.v2i1.25602>
- Raharjo, A. (2007). Implikasi Pembatalan Undang-Undang Komisi Kebenaran Dan Rekonsiliasi Terhadap Prospek Penanganan Pelanggaran Berat Hak Asasi Manusia. *Mimbar Hukum*, 19(2007).
- Rakia, A. S. R. S., Suaib, H., & Simanjuntak, K. W. (2021). Continuing the Limited Authority of the Majelis Rakyat Papua; A Missed Opportunity. *Cosmopolitan Civil Societies*, 13(3), 34–50. <https://doi.org/10.5130/ccs.v13.i3.7915>
- Salam, S., & Suhartono, R. (2020). The Existence Legal Certainty of the Truth and Reconciliation Commission in Indonesia. *Musamus Law Review*, 2, 76–85. <https://doi.org/10.35724/mularev.v2i2.2849>
- Schiller, R. (2011). Reconciliation in Aceh: Addressing the social effects of prolonged armed conflict. *Asian Journal of Social Science*, 39(4), 489–507. <https://doi.org/10.1163/156853111X597297>
- Sonata, D. L. (2014). Metode Penelitian Hukum Normatif Dan Empiris: Karakteristik Khas Dari Metode Meneliti Hukum. *Fiat Justisia Jurnal Ilmu Hukum*, 8(1), 15–35. <https://doi.org/http://dx.doi.org/10.25041/fiatjustisia.v8no1.283>
- Sunggono, B. (2005). *Metode Penelitian Hukum*. RajaGrafindo Persada.
- Taufik, Z. 'Ain. (2017). Penyelesaian Kasus Pelanggaran Ham Berat Melalui Pola Rekonsiliasi Pasca Putusan Mahkamah Konstitusi Tahun 2006 (Settlement of Cases of Gross Human Rights Violations Through Post-Decision Reconciliation Pattern of 2006). *Jurnal IUS*, 5(2), 202–218. <https://doi.org/10.29303/ius.v5i2.454>
- Thea, A. (2023, May 3). *Menkopolkam: Penyelesaian Non Yudisial Pelanggaran HAM Berat Masa Lalu Fokus Pada Korban*. *Hukum Online*.
- Ubbe, A. (2013). *Penelitian Hukum Tentang Peran Masyarakat Hukum Adat Dalam Penanggulangan Pembalakan Liar*.

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Zvobgo, K. (2020). Demanding truth: The global transitional justice network and the creation of truth commissions. *International Studies Quarterly*, 64(3), 609–625. <https://doi.org/10.1093/isq/sqaa044>.