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Changing presents, shifting past(s): the diverse interests of transitional justice and cultural heritage in the case of the Iranian revolution

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ABSTRACT

Cultural heritage and transitional justice both seem to be established terms with fixed connotations: the former of universally valued and appreciated cultural objects and the latter of processes related to replacing a non-democratic regime with a democratic one. The social, political and legal realities of actual transitions and cultural objects caught in their midst, however, are much more complex. One such particular case was the Iranian Revolution of 1979 and its immediate aftermath, which, despite being a distinct transition from one non-Western regime to another, encountered similar issues with regard to the preservation of cultural heritage objects linked to the former establishment. The purpose of this paper is thus to provide a better understanding of the non-traditional processes of transitional justice, with a special focus on the place of cultural heritage objects during a transition using the example of Iran.

Introduction

This paper, like so many others, was born out of a brief discussion in passing between its authors. One of us was describing his failed research collaboration concerning the different transitional justice approaches to the post-communist and post-fascist heritage still present in Europe; the other offered to read his notes so that they do not go to waste. Soon, our debate shifted further East, leaving the already broadly analysed cases of

the 1945 and 1989 transitions, rather deliberating Iran and its heritage in the aftermath of the Revolution. Some of the questions that we found particularly worth investigating were as follows: What happened to the contentious Iranian cultural heritage following the 1979 Revolution? Did the transitional justice processes work in a similar or a different way in this case? And can we speak about transitional justice at all in this regard? These issues resonated with us both, and we spent the following weeks delving deeper into the problem.

With one of us a law and memory scholar and another an Iranian academic, we identified, to a point, a number of similarities between the legal, political and social circumstances of regime changes in Central and Eastern Europe (CEE) and South America and the processes that took place in Iran. However, it soon became apparent that the Western concept of transitional justice does not translate completely to the case of non-democratic, non-Western political transitions, such as the one in Iran. Thus, we propose to begin a conversation about atypical transitional justice processes, arguing that, in general, political and legal transitions take a similar route, even if their final destination differs. Out of a veritable mosaic of the different elements of a transition, we choose to focus on one that has been following political shifts for centuries: contentious cultural heritage. Be that in ancient Egypt, Greece or Rome, when names of certain rulers were removed from public spaces following a power shift, in Revolutionary France, Germany after 1945 or CEE after 1989, every new government, be that democratic or non-democratic, needs to deal with difficult cultural heritage following a transition, as it has also been in the case of Iran. Since the twentieth century, these changes have been particularly emblematic of the new authorities' policies, geopolitical standing and the new official narrative they are going to promote, and as such, their study provides various answers on the nature of the transition in question and transitional justice processes in general, as we hope to do in this article.

The paper is structured as follows: in its first part, we provide the theoretical and historical background of our investigations, introducing the concepts of collective memory and cultural heritage, showing their role during a regime change, as well as their links with transitional justice, ultimately proposing the latter's rereading to fit the non-Western context of Iran. It is also in this first part that we introduce pre-Revolution memory politics and the Revolution itself as an example of a political transition. In the second part of the paper, we analyse two case studies regarding Iranian cultural heritage following the Revolution, including the changes to street names and the removal of the Lion and Sun symbol. The third and final part of the paper is devoted to the analysis of the processes taking place in Iran following the Revolution within the cultural heritage context, pondering upon a more general meaning of transitional justice.

Part 1. Between theory, past and present: the background

Transitions do not take place in a vacuum. While they are carried out by political and social work – and will – of the people, in their actions, they are influenced by a number of different factors, such as culture, identity, ethnicity, religion, etc. Of particular interest to this paper are collective memory, which stands behind these cultural products, and cultural heritage, which in itself is their expression. Both play a major role in transitional processes and, as such, merit closer introduction.

Collective memory: the basis of social life

Introduced as a concept by Maurice Halbwachs in the 1920s, rooted in the work of Henri Bergson and Émile Durkheim, the idea of collective memory has been developed, redeveloped and criticized over the years.[1] Defined by one of us elsewhere as 'a social memory, one which is not created individually, but within a group, with one person having a wide array of collective memories functioning on different levels – as each and every one of us is at the same time a part of a family, a class, a city, a nation – and today also of the global community,' collective memory is 'influenced by a number of factors, in particular by governments, both on the local and the national level,'[2] through the so-called politics of memory or memory politics, which include such decisions as changes to the cityscapes and their cultural heritage, including modifications of street names, removal of monuments, or, more generally, choosing which heritage is designated as worth protecting, and what is allowed to be destroyed or fall into oblivion.[3]

Importantly, collective memory does not equal history, being rather a non-systemic and non-systematic 'reflection on the past,' with the two polar opposites holding the representations of the past in-between them.[4] The inner workings of collective memory and its relation to individual remembering have recently been illustrated particularly well by Cordonnier et al., who proposed their conceptualization of memory as an hourglass, with the collective (political, social and historical contexts) on top, the individual (personal attitudes, social identifications and beliefs) at the bottom, and, at the narrow middle, family memory (the 'meeting point' or the 'filter' between the official and the private history); importantly, they argue, the 'sand of

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[1]For the analysis of the roots and development of the concept of collective memory, see Mirosław M Sadowski, 'Law and Memory: The Unobvious Relationship' (2017) 16 (2) *Warsaw University Law Review* 265–70; 272–77.
[2]Mirosław M Sadowski, 'City as a Locus of Collective Memory. Streets, Monuments and Human Rights' (2020) 40 (1–2) *Zeitschrift für Rechtssoziologie – The German Journal of Law and Society* 211.
[3]Ibid 215–18.
[4]Grażyna Gliwka, 'Collective Memory – Its Functions and Mechanisms of Transmission in the Context of Research by Barbara Szacka and Andrzej Szpociński' (2019) 13 (3) *Rozprawy Społeczne* 19.

memory' can flow in both directions should the hourglass be inverted, with the mutual collective-individual memory influences symbolized by putting the hourglass on its side, when it resembles the infinity symbol.[5] In this paper, we are particularly interested in the top-to-bottom, collective to individual direction of the flow of memories, one that is greatly impacted by culture – to continue with borrowed metaphors, we assert after Gallo that 'remembering is not analogous to opening a window on the past, but is an activity occurring in the context of a culturally meaningful life and constructed using cultural materials as well as personal experience.'[6]

Moreover, our focus is on the collective memory processes taking place within transitory circumstances. While speaking about democratic regime changes, Marszałek-Kawa and Wawrzyński demonstrate more generally how collective memory becomes a political tool during a transition, with the new authorities aiming to, through the use of culture, turn memories of the yesteryear into 'independent cultural contents' that may help them 'control how citizens reconstruct, interpret or imagine the past, and – what is even more important – to regulate how they link past experiences with the present state of a society.'[7] Importantly, the 'transitional value' of newly minted collective memories lies in 'their future-orientation and influence on a nation's political identity'[8] – as they become vital elements of social solidarity and cohesion, they not only help re-establish social bonds but also provide the ideological basis for the group in question, legitimizing its existence and its power structure.[9]

This control all governments have over collective memory, through, e.g. the regulation of school curricula, placement of monuments and more general decisions regarding heritage protection, allows them to determine both 'what is to be remembered' and 'how a given period should be interpreted,' as well as to manipulate 'symbols, values and systems of meanings.'[10] Nevertheless, this power is constantly being challenged by those social actors who have different than official collective memories,[11] instead holding the so-called counter-memories, i.e. the memories that confront 'the interests at stake in collective memory' on the national[12] or local level. As such, in the

[5]Aline Cordonnier, Valérie Rosoux, Anne-Sophie Gijs and Olivier Luminet, 'Collective Memory: An Hourglass between the Collective and the Individual' (2022) 1 *Memory, Mind & Media* 3–5.

[6]Linda C Garro, 'The Remembered Past in a Culturally Meaningful Life: Remembering as Cultural, Social, and Cognitive Process' in Camilla C Moore and Holly F Matthews (eds), *The Psychology of Cultural Experience* (Cambridge University Press 2001) 133.

[7]Joanna Marszałek-Kawa and Patryk Wawrzyński, 'Remembrance, Identity Politics and Political Transitions: A Comparative Study' (2016) 45 *Polish Political Science Yearbook* 12.

[8]Ibid 15.

[9]Gliwka (n 4) 20–21.

[10]Gliwka (n 4) 21.

[11]Chris Weedon and Glenn Jordan, 'Collective Memory: Theory and Politics' (2012) 22 (2) *Social Semiotics* 144.

[12]Ibid 150.

case of a political transition, one group needs to 'concede […] their narrative' to 'give way to that of the other side,'[13] and a certain collective memory inversion takes place whereby the counter-memories of the former oppositions, now in power, become the official collective memory of the state, whereas those propagated by the former authorities turn into counter-memories themselves.[14]

As already noted above, changes to the official collective memory also impact the cityscape. To follow Nora, certain sites, which he calls places of memory, or *lieux de mémoire*, have a particular relationship with collective memory, as 'the will of the people, or the work of time turns [them] into a symbolic element of memorial heritage of a community,'[15] and thus 'an important source in the constitution of collective memory.'[16] They can take a number of different forms, but it is the interlinked material and immaterial one of the cityscape – and its cultural heritage – which will be particularly interesting for our research, as it is 'the landscape' that 'comes to index the past for those who inhibit the present.'[17]

It needs to be noted that, both in transitional and non-transitional circumstances, when shaping collective memory groups turn to 'books, libraries, museums, monuments, archives, film and television,'[18] as well as the new media, with the authorities relying on 'state supported cultural and educational institutions and practices' and 'the cultural industries,' which together 'serve as gatekeepers facilitating processes of remembering and forgetting.'[19] In the case of a transition, however, and the process of collective memory inversion, there soon arises a salient question of dealing with those sites that are places of memory of the former regime. While they are still a part of the cultural heritage of the group in question – potentially even of universal cultural heritage belonging to all humanity – their meaning is forever changed by the transition, as they become sites of a corrupt memory. As such, the new authorities, asserting their power over collective memory, most often, as in the case of Iran, work diligently to change them. What are the potential scenarios for dealing with contentious heritage, how does transitional memory inversion actually work within the built environment, and what is the place of heritage law in these processes? To answer these questions, we first propose to turn to the concept of cultural heritage itself.

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[13]Catherine Turner, 'Deconstructing Transitional Justice' (2013) 24 *Law Critique* 193 at 203.
[14]Mirosław M Sadowski, 'Law and Memory: Intersections' (DCL thesis, McGill University 2023) 63.
[15]Pierre Nora, *Lieux de mémoire III. Les France* (Gallimard 1992) 20.
[16]Weedon and Jordan (n 11) 146.
[17]Brigittine M French, 'The Semiotics of Collective Memories' (2012) 41 *Annual Review of Anthropology* 342.
[18]Weedon and Jordan (n 11) 144–45.
[19]Weedon and Jordan (n 11) 150.

Cultural heritage: dealing with the contentious

Similar to collective memory, cultural heritage is a complex and multi-faced term. One of us defined it earlier as 'the broadly understood tangible and intangible products of cultural past (ranging from buildings to whole urban landscapes to traditions to digital cultural heritage)' – importantly, of not only distant but potentially also a very recent past – which are 'of notable historical, social, religious, artistic, architectural, etc., importance for the local, regional, national and or global community' resulting in cultural heritage's 'dynamic relationship with them based on collective memory,'[20] an element of which, in the case of places of memory, we remarked upon above.

In a way, cultural heritage's relationship with the state mirrors that of collective memory – which, given the links between the two, is to be expected – however, it is even more dependent on the question of power: where collective memory is constantly being reconstructed within the different groups one belongs to, a nation being only one of them, what becomes designated as cultural heritage depends on the work of experts, 'who position themselves as uniquely suited to guide the heritage process, and whom legitimating institutions like the state support in that claim,' being responsible for the establishment of the 'authorised' past.[21] Importantly, this officially recognized as past heritage is then used to construct the state's collective memory. In addition, just as the official collective memory is challenged by countermemory, so cultural heritage may 'involve discordant stories and public uses of memories and representations of pasts that are contentious,'[22] becoming 'an ethical tug-of-war between its use by powerful formations such as nation states' and 'its use by less powerful groups to fight against forms of forgetting.'[23] These mechanisms are particularly amplified if the heritage in question is itself contentious.

The possible contentiousness of cultural heritage involves the different claims of collectivities that infringe on other groups' interests[24] with regards to the cultural object in question, challenging the official narratives 'while pointing to issues that are perceived as dissonant, painful

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[20]Mirosław M Sadowski, 'Heritage Strikes Back: The Al Mahdi Case, ICC's Policy on Cultural Heritage and the Pushing of Law's Boundaries' (2022) 2 *Undecidabilities and Law. The Coimbra Journal of Legal Studies* 101.

[21]Christine Bucior, 'History's Priests, History's Magicians: Exploring the Contentious Relationship between Authorized Heritage and Ghost Tourism in Gettysburg, Pennsylvania' (2020) 15 (3) *Journal of Heritage Tourism* 339.

[22]Iris van Huis, Sigrid Kaasik-Krogerus, Tuuli Lähdesmäki and Liliana Ellena, 'Introduction: Europe, Heritage and Memory—Dissonant Encounters and Explorations' in Tuuli Lähdesmäki, Luisa Passerini, Sigrid Kaasik-Krogerus and Iris van Huis (eds), *Dissonant Heritages and Memories in Contemporary Europe* (Palgrave Macmillan 2019) 8.

[23]Tracy Ireland and John Schofield, 'The Ethics of Cultural Heritage' in Tracy Ireland and John Schofield (eds), *The Ethics of Cultural Heritage* (Springer 2015) 3.

[24]Ibid 17.

or divisive.'[25] This may concern the questions of 'belonging, identity and ownership,'[26] with potentially divergent interests of local citizens and conservationists,[27] shifting perceptions as to what constitutes a tradition worth continuing,[28] and being related to dark periods of national history[29] that appear on a local scale through cultural heritage.[30] As such, the material legacy of past political regimes following the transition needs to undergo the difficult and unobvious processes 'of being identified, recognised and treated as heritage'[31] – but not necessarily preserved, given that contentious heritage is often neglected or destroyed on the basis of political decisions.[32]

In this paper, we regard all elements of the cityscape linked to collective memory as cultural heritage, given that 'the built environment carries important meanings from one generation to the next, and serves as a one repository of cultural meanings.'[33] We propose to understand cultural products broadly, including street names – which, when given a commemorative name, 'transcend their basic orientational role and come to exert symbolic, semiotic and connotative functions'[34] – as well as monuments and symbols – through the creation and propagation of which 'collective memory is established and memories are linked to and anchored in certain places'[35] – which also carry with them and influence social perceptions of the past. As such, cultural heritage in general and contentious heritage in particular have a distinct relationship with transitional justice, which we analyse below.

Transitional justice: between its critique and cultural heritage

Transitional justice has been proposed as a concept to encompass the various processes taking place following a regime change, including the different

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[25]Marion Hamm, 'Making Heritage Contentious. On the Productivity of Conflicts and Dissonances' in Marion Hamm and Klaus Schönberger (eds), *Contentious Heritages and Arts: A Critical Companion* (Wieser 2021) 22.

[26]Katarzyna Puzon, 'Saving Beirut: Heritage and the City' (2019) 25 (9) *International Journal of Heritage Studies* 915.

[27]Kristin Ilves, 'The Archaeologists within: Uniting Different Interests in Heritage within a Contentious Setting' (2021) (n.d.) *Journal of Community Archaeology & Heritage* 2–3.

[28]Rob van Ginkel, 'Killing Giants of the Sea: Contentious Heritage and the Politics of Culture' (2005) 15 (1) *Journal of Mediterranean Studies* 72; 93.

[29]Sharon Macdonald, 'Exhibiting Contentious and Difficult Histories. Ethics, Emotions and Reflexivity' in Bernice L. Murphy (ed), *Museums, Ethics and Cultural Heritage* (Routledge 2016) 267.

[30]Louise Wilshin, 'Apprehending Contentious Heritage, An Interactive Platform for the Bassins à Flot of Bordeaux' in Ona Vileikis (ed), *The Right to [World] Heritage. Conference Proceedings* (IAWHP 2014) 367.

[31]Laura Demeter, 'Value Creation Mechanisms and the Heritisation of the Communist Legacy in Romania' in Ona Vileikis (ed), *The Right to [World] Heritage. Conference Proceedings* (IAWHP 2014) 9.

[32]Wilshin (n 30) 382.

[33]Christopher Tweed and Margaret Sutherland, 'Built cultural heritage and sustainable urban development' (2007) 83 *Landscape and Urban Planning* 65.

[34]Mihai S Rusu, 'Shifting Urban Namescapes: Street Name Politics and Toponymic Change in a Romanian (ised) city' (2019) 65 Journal of Historical Geography 48.

[35]Christiane Hintermann, 'Who has the right to be remembered? Erinnerungs- und Gedächtnisorte der Migration in Wien' ['Who has the right to be remembered? Sites of Remembrance of Migration in Vienna'] (2019) 107 (1) *Geographische Zeitschrift* 16.

mechanisms employed to manage the legal, political and social aspects of the transition. Typically, it is applied to transitions 'from one form of (usually repressive) rule to a more democratic order,'[36] working 'discursively to establish a break between the violent past and a peaceful, democratic future, and is based upon compelling frameworks of resolution, rupture and transition,'[37] as well as on the establishment, or in certain cases the reestablishment of the rule of law.[38] Its other goals include judicial retribution, reparations (both symbolic and material), institutional reform, nation-building, social transformation based on shared collective memories, and reconciliation.[39]

In approaching regime changes, transitional justice is based on a number of dichotomies, including those of war and peace, peace and justice, good and evil, victims and perpetrators, democratic and non-democratic, repressive and transformed,[40] which allow us to draw clear distinctions between the old and the new authorities. Additionally important is the clarification of 'the principles of justice constitutive of transitional justice,'[41] i.e. the establishment of what kind of justice the transitional processes are going to engage in. As such, law's role in particular has become perceived as key in the transitory processes over the years,[42] given that, once it came to be understood as fluid and flexible in the context of a transition,[43] the authorities turned to the creation of various state institutions in order to 'meet the aims' of transitional justice,[44] thus allowing to organize and carry out the necessary systematic changes.[45] This turn to law, as Turner poignantly observes, ignores the social circumstances that led to the transition[46] and is in a way paradoxical, in that transitional justice 'seeks to address past failings of law by replacing it with law,'[47] opening the door to political manipulation even during the most democratic transitions, as it always leads to the ignoring of the underlying causes of the transition.[48]

Despite these issues, transitional justice is still a useful theoretical construct for analysing some regime change cases; however, in its current form, transitional justice cannot be regarded as a panacea for the

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[36]Turner (n 13) 193–94.
[37]Lia Kent, 'Transitional Justice in Law, History and Anthropology' (2016) 42 (1) *Australian Feminist Law Journal* 1.
[38]Patricia Lundy and Mark McGovern, 'Whose Justice? Rethinking Transitional Justice form the Bottom Up' (2008) 35 (2) *Journal of Law and Society* 266.
[39]*Ibid.* 267.
[40]Turner (n 13) 194.
[41]Colleen Murphy, *The Conceptual Foundations of Transitional Justice* (Cambridge University Press 2017) 32.
[42]Kieran McEvoy, 'Beyond Legalism: Towards a Thicker Understanding of Transitional Justice' (2007) 34 (4) Journal of Law and Society 415–16.
[43]Turner (n 13) 197.
[44]McEvoy (n 42) 422.
[45]Turner (n 13) 194.
[46]Turner (n 13) 203.
[47]Turner (n 13) 199.
[48]Kent (n 37) 2–3.

understanding of political shifts. In its conceptualization, it has become increasingly Occidental in recent years,[49] due to the linking of the goals of transitional justice with those of peace, democracy and the rule of law,[50] the two latter ones 'based on liberal and essentially Western formulations of democracy,'[51] as well as its top-down focus,[52] which excludes the local contexts and the underlying causes for the transition in those instances where they may 'challenge the forms and norms of Western governance or implicate dominant global relations' as one of the transition's sources.[53]

Thus, we disagree with Murphy, who proposed that 'democracy is a necessary feature of transitional justice', as only then is a transition 'morally defensible.'[54] While the main goals of transitional justice are most definitely peace, stability and the facilitation of coming to terms with the difficult past through various legal mechanisms, the understandings of the rule of law[55] and justice differ from one cultural and legal system to another, of which Islam, as in the case of Iran, is just one example. These differences in the end product of a transition should not prohibit us from analysing a regime change from a transitional justice perspective – even if a transformation does not lead to liberal democracy, all political transitions, both from non-democratic to democratic and from non-democratic to different non-democratic regimes, undergo a similar process. Following a period of revolution, stability and reckoning with past injustices need to take place, and we cannot look at them either from a purely Western or from a purely legal perspective. As such, we agree with Lundy and McGovern, who argued that 'the narrow focus on questions of law' in transitional justice results in a lack of understanding of 'the issues at stake and the consequences of transitional processes by removing them from a wider structural social, political, and economic context.'[56] Thus, we propose to turn the focus of our analysis of the regime change in Iran to cultural heritage and the interconnected shifts in collective memory taking place in the country's society, which mirror those happening in post-transitional societies in general.

Cultural heritage has particular ties with transitional justice: during all regime changes, it becomes 'heavily mobilised,'[57] as heritage may 'be used to create, resurrect and preserve certain narratives about the past that

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[49]Pierre Hazan, *Judging War, Judging History: Behind Truth and Reconciliation* (Stanford University Press 2010) 48.
[50]Turner (n 13) 197.
[51]Lundy and McGovern (n 38) 273.
[52]McEvoy (n 42) 421.
[53]Lundy and McGovern (n 38) 274.
[54]Murphy (n 41) 36.
[55]Mirosław M Sadowski, 'Law and Collective Memory in the Service of Illiberalism. Through the Looking-Glass: Transformation or a Reactionary Revolution?' (2021) 1 (XVIII) Krakowskie Studia Międzynarodowe – Krakow International Studies 108–09.
[56]Lundy and McGovern (n 38) 275.
[57]Rusu (n 34) 162.

significantly impact national cultural identity and the overall possible direc-tions of the transitional process.'[58] This also means that the question of 'managing' contentious heritage soon becomes both a major issue for the new authorities[59] as the collective memory inversion ensuing following a transition means that some elements of cultural heritage linked to the pre-vious regime are going to be subject to change.

Thus, the post-transition regime will need to choose 'between different, contested images of the past,'[60] deciding on what is going to remain in the public sphere and what will need to go. Importantly, for the implementation of these memory policies, the new regime employs heritage law itself, as it permits the authorities to not only construct narratives on the basis of what it protects but also 'is the means through which these narratives can be weaved.'[61] As such, in transitional contexts, heritage law may find itself at a crossroads between its 'commitment to preservation and conservation' of the *status quo*[62] and the needs of the post-transitional society to remove contentious objects – and collective memories – from the public sphere.

Importantly, what happens to the 'erased' spaces carries deep meanings in itself: in some cases, 'empty plinths are left as a reminder' of the past; in others, these places of memory are reused, readapted, or even turned into objects of ridicule.[63] At the same time, the new authorities may even choose to reconstruct and restore some of the previously removed or destroyed cultural heritage, thus visibly overturning the collective memory policy of the old regime[64] and cementing its authority in the matters of the past. In our analysis of the two Iranian case studies, we will demonstrate the various processes that surround contentious cultural heritage in transi-tional circumstances. First, however, we introduce the memory policies pre-dating the Iranian Revolution, as well as its overview from a transitional perspective.

Before and during the Iranian Revolution: a case of (memory) politics at play

The use of symbols by the Iranian state before the 1979 Revolution played a pivotal role in shaping collective memory and aimed to establish and

[58]Lucas Lixinski, 'Cultural Heritage Law and Transitional Justice: Lessons from South Africa' (2015) 9 *International Journal of Transitional Justice* 278.
[59]Tim Benton, 'Heritage and changes of regime' in Tim Benton (ed), *Understanding Heritage and Memory* (Manchester University Press 2010) 126
[60]Demeter (n 31) 8.
[61]Lixinski (n 58) 296.
[62]Lucas Lixinski, *Legalized Identities. Cultural Heritage Law and the Shaping of Transitional Justice* (Cambridge University Press 2021) 95–96.
[63]Benton (n 59) 128–30.
[64]S A Smith, 'Contentious Heritage: The Preservation of Churches and Temples in Communist and Post-Communist Russia and China' (2015) 226 (Issue Supplement 10) *Past and Present* 202.

reinforce a distinct national identity. The first attempts at glorification of Iran's pre-Islamic past by the state were made in Reza Shah's period.[65] During that time, the 'state's attempt to cultivate a new iconography for Iranians had to compete with this long-established socialisation of most Iranians to an alternative set of icons and rites commemorating them.'[66] The state's attempts to assert power over collective memory often yielded contrary results. The imposition of new symbols clashed with the established ones, mainly religious, while the perceived lack of authenticity and organic connection hindered the desired impact on the population. This resulted in complex challenges and unintended consequences, as 'the symbolism used by the state became, for at least a large part of Iranian society, counterproductive.'[67] As one scholar notes,

> The institutional and conceptual framework of the Iranian nation became successfully established by the early twentieth century, but the question of which culture should animate the new national framework went unanswered. The 'dual society' or 'two cultures' phenomenon—in which a secular, pre Islamic-based nationalism became the official culture of the state and elite classes while Islam became the basis of an increasingly popular identity among the urban and rural masses—is therefore a phenomenon not only of the period preceding the revolution of 1979.[68]

During the Pahlavi period, the state played a significant role in shaping the collective memory of the nation. Through the strategic implementation of commemorative activities and selective memory, the authorities aimed to establish a culture that was both secular and nationally oriented and came 'at the expense of Iran's religious heritage.'[69]

The Pahlavi elite and the state exhibited a deep desire to attach the greatness of ancient Iran to specific, tangible, and historical objects, shaping the collective memory and earning legitimacy. This historical self-perception not only influenced domestic ideology but also served 'as a justification for Iran's pro-Western policy in the world arena.'[70] By aligning itself with the Western world, the Pahlavi regime aimed to present its alliance as loyal to 'Iran's remote past, its origins, and true spirit.'[71] However, this perception faced scepticism and resistance, both domestically and internationally,

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[65]Richard W Cottam, *Nationalism in Iran, Updated Through 1978* (University of Pittsburgh Press 1979) 9. According to Cottam 'the roots of nationalism, of course, extend into the extraordinary rich Iranian civilization down to and beyond the Achaemenid period' yet 'nationalism was not a significant force in Iran prior to the 1890s.' Ibid 11.

[66]Menahem Merhavy, *National Symbols in Modern Iran: Identity. Ethnicity, and Collective Memory* (Syracuse University Press 2019) 12.

[67]Ibid.

[68]Afshin Marashi, *Nationalizing Iran: Culture, Power, and the State, 1870–1940* (University of Washington Press 2008) 14.

[69]Ibid 113.

[70]Merhavy (n 66) 181.

[71]Ibid.

highlighting the complexity of reconciling historical narratives with contemporary geopolitical alignments.

Moreover, the state's historical self-perception, influenced by ideological considerations and utilized for justifying pro-Western policies, further complicated the reception and acceptance of its symbolism. This nuanced understanding underscores the complexities of shaping collective memory in a diverse and historically rich society such as Iran. Ultimately, understanding the intricate dynamics of symbol usage by the state provides valuable insights into the broader socio-cultural and political context of Iran before the Revolution and how the resistance to the Pahlavis' attempt showed themselves after the 1979 Revolution, when the state tried to shape the collective memory by focusing mainly on the Islamic element of the Iranian identity.

The intrinsically constructed official narrative came crushing down not long after it was established: on 11 February 1979, the Iranian Revolution ended not only the relatively short-lived Pahlavi dynasty but also, more importantly, almost 2,500 years of continuous rule of monarchs in the country. No significant event in history is separate from its previous moments or unconnected to events that will follow, and the Iranian Revolution is no exception.[72] It is not the focus of this paper to provide a detailed analysis of the Iranian Revolution itself. Nevertheless, a brief overview of some of the underlying causes of the Revolution can provide a better understanding of our case studies with regard to the place of contentious cultural heritage in the aftermath of the Iranian Revolution.

It is not an easy or perhaps even possible task to find the precise origins of the Iranian Revolution of 1979. While there is a broad scholarly debate and dispute on the origins of the Revolution, 'there can be no doubt that the challenge to the Pahlavi's reign and rule was neither spontaneous nor unprovoked.'[73]

For the first time since the Constitutional Revolution,[74] different social groups gathered together, including clergy, landowners, intellectuals, middle-class workers and the lower class, to express dissatisfaction with the Pahlavi regime and seek the overthrow of the Shah. Different factors

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[72] Jahan Amuzegar, *The Dynamics of the Iranian Revolution: The Pahlavis' Triumph and Tragedy* (State University of New York Press 1991) 6.

[73] Ibid.

[74] Iranian Constitutional Revolution took place between 1905 and 1911. Iranians had campaigned for political change during the Iranian Constitutional Revolution to limit monarch's absolute power and establish a constitutional government. Both religious and secular figures were deeply involved in the Revolution. During this period the first Iranian constitution was signed (and in abolished 2 years later to be re-established in 1909) and the first parliament was introduced. For an overview of the Iranian Constitutional Revolution See Ervand Abrahamian, *Iran Between Two Revolutions* (Princeton University Press 1982) 50–101, Ahmad Kasravi, *Tārīkhi Mashrūṭiyi Iran* (History of the Iranian Constitutionalism (Amirkabir Press 1961), Janet Afary, *The Iranian Constitutional Revolution, 1906–1911: Grassroots Democracy, Social Democracy, & Origins of Feminism* (Columbia University Press 1996).

throughout at least half a century, if not longer, directly led to the Iranian Revolution.[75]

In 1953, a pro-Shah coup orchestrated by the United States Central Intelligence Agency and the United Kingdom Secret Intelligence Service ended the power struggle between Shah Mohammad Reza Pahlavi and Prime Minister Mohammad Mossadegh. After the coup, Pahlavi further allied with the United States and the Western bloc to rule more firmly as an authoritarian monarch. He relied heavily on US support to stay in power – including financial aid and technical assistance for the establishment of secret police – which he held for another twenty-six years.[76] The Shah 'used martial law, military tribunals, and the 1931 decree against 'collectivist ideology' to crush all […] opposition parties.'[77]

In the 1950s, the Shah 'consolidated his control over much of the country' and through provincial governors 'tightly supervise[d] parliamentary elections and thereby control[led] both the Majles (the lower chamber of the Parliament) and the Senate.'[78] Ultimately, the parliament was divided between two loyalist parties (National party and People's party). The Shah's grip over the parliament was so broad that two parties were simply known as the 'yes' and the 'yes sir' parties.[79] Later, in 1975, the Shah decided to dissolve the two parties and create a single party, *Rastakhiz* (Resurgence).[80] The Shah's aim was to 'transform the somewhat old-fashioned military dictatorship into a totalitarian-style one-party state.'[81]

His overambitious economic plans also did not bring the result he was looking for. Feeling more powerful than ever, in 1963, the Shah launched his aggressive modernization plan, known as the White Revolution. At first glance, all was going in the right direction for the country, as the economy was developing rapidly, and the infrastructure was modernizing. However, in less than a generation, Iran changed from a traditional, conservative, and

[75]As one scholar suggests countless attempts to reform the system during the Pahlavi Regime were unsuccessful and 'stresses and strains have through the years manifested themselves in (1) a perpetual challenge to Iran's tradition of centralised monarchic absolutism by modern, liberal, Western-oriented intellectuals; (2) a festering rift between the crown and the mosque regarding primacy of legitimate power; (3) a latent divergence between Persian imperial pretensions and tribal, ethnic, and Islamic consciousness; (4) a nagging clash between a nationalistic desire for independence and self-reliance and oil sanctioned global interdependence; and (5) a sharp encounter between rapid tempo of economic development and the slow pace of political progress.' Amuzegar (n 65) 6.
[76]Abrahamian (n 74) 419.
[77]Ibid.
[78]Ibid 420.
[79]Ibid.
[80]The Shah previously believed that the two-party system was an indicator that Iran was a constitutional monarchy and not a dictatorship: 'If I were a dictator rather than a constitutional monarch, then I might be tempted to sponsor a single dominant party such as Hitler organised or such as you find today in Communist countries. However, as constitutional monarch I can afford to encourage large-scale party activity free from the strait-jacket of one-party rule or the one-party state.' Ibid 440 quoting Mohammad Reza Pahlavi, *Mission for My Country* (Hutchinson 1961) 173.
[81]Ibid 441.

rural society to an industrial, modern, and an urban one. Efforts to profoundly modify agriculture and industry were premature, and the feeling that the government, due to corruption or incompetence, had not fulfilled all its promises manifested itself in widespread protests of 1978. Therefore, Abarahamian suggests:

> by 1977, the gulf between the developing socioeconomic system and the underdeveloped political system was so wide that an economic crisis was able to bring down the whole regime. In short, the revolution took place neither because of overdevelopment nor because of underdevelopment but because of uneven development.[82]

Among the growing economic difficulties, social and political repression by the regime intensified in the 1970s. Opportunities for political participation were few, and opposition parties were marginalized or banned. Social and political resistance often faced censorship, surveillance or intimidation, as well as illegal detention and torture. For the first time in more than half a century, secular intellectuals were swayed by the appeal of Ayatollah Ruhollah Khomeini, who was in exile since 1964 for his dissent on the White Revolution. Khomeini continued to publicize the atrocities committed by the Pahlavi government and accused the Shah of ignoring religion and being a puppet of foreign powers. All in all, the United States' influence, Shah's close relations with Israel and his regime's unrealistic economic policy contributed to the major dissatisfaction within Iranian society. Amid massive tensions between Khomeini and the Shah, protests began in October 1977, escalating into a campaign of civil resistance that included both secular and religious elements.

Weakened by cancer and surprised by the sudden hostility against him, the Shah wavered between concessions and repression, suggesting that the protests were part of an international conspiracy against him. The government forces arrested, tortured and killed a large number of people during anti-regime demonstrations only to incite violence in a country where martyrdom plays a central role in religious identity.

In January 1979, the Shah and his family left Iran for a 'vacation'. The Viceroy's Council, which had been set up to govern the country in the monarch's absence, was unable to function, and Shahpur Bakhtiyar, a former member of the opposition who became the prime minister following a haste appointment by the Shah before his departure, was unable to reconcile with former partners of the Front National or Khomeini. More than a million people protested in Tehran, demonstrating broad support for Khomeini, who arrived in Iran on February 1. Ten days later, Iranian armed forces declared neutrality and effectively ended the Shah's regime. Radio Tehran's

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[82]Abrahamian (n 74) 427.

announcement 'sanctioned' the changes in Iran a day later: 'the bastion of dictatorship has collapsed.'[83]

Part. 2 Cultural heritage amidst the Iranian Revolution: two case studies

When the Shah of Iran, Mohammad Reza Pahlavi, was celebrating his lavish coronation in 1967, it was almost unimaginable that massive demonstrations would end his reign in a short time. Like any other transition, the Revolution was just the beginning of a long process of change in Iran. Cultural heritage sites were not an exception. Soon after the Revolution, attempts were made to change the cityscape to free the national identity from the reminders of the old regime. The new system also actively pursued its own commemoration policy, focusing more on the Islamic past. This led to the creation of counter-memories and on a certain level, resistance to the new official narrative. Nevertheless, most of the signs of the monarchy disappeared completely from the Iranian public spaces and collective memory.

Of these, perhaps the most emblematic is the fate of the Museum of Contemporary Art and its collection, in an almost overnight example of collective memory inversion from internationally celebrated to locked up in the cellar. To this day considered to be 'the finest collection of modern art anywhere outside Europe and the US, boasting works by Jackson Pollock, Francis Bacon, Andy Warhol, Edvard Munch, René Magritte and Mark Rothko,' among others,[84] the collection was compiled under the supervision of the Shah's wife, Farah Pahlavi, and her office in the 1970s. As such, and as representations of the non-Islamic, Western cultural heritage, the artworks were in danger of being destroyed during the Revolution – in the end, they were protected from the protesters by the museum's staff in the basement, and only Farah Pahlavi's Andy Warhol portrait and a Bahman Mohassess sculpture were damaged, while a de Kooning was later exchanged for a piece of Persian art by the new Iranian authorities.[85] Nevertheless, the majority of remaining works were relegated to the basement for many years, being displayed publicly very rarely since the Revolution, most recently during a large exhibition in 2022 (which still did not include, however, the Warhol paintings of the Pahlavi family, as well as certain nudes).[86]

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[83] Abbas Milani, *The Shah* (Palgrave Mcmillan 2011) 7.

[84] Saeed Kamali Dehghan, 'Tehran Exhibition Reveals City's Hidden Warhol and Hockney Treasures' (2012) *The Guardian* <https://www.theguardian.com/world/2012/aug/01/tehran-exhibition-hidden-warhol-hockney >.

[85] Saeed Kamali Dehghan, 'Former Queen of Iran on Assembling Tehran's Art Collection' (2012) *The Guardian* <theguardian.com/world/2012/aug/01/queen-iran-art-collection>.

[86] Associated Press in Tehran, 'Tehran museum unveils western art masterpieces hidden for decades' (2022) *The Guardian* <theguardian.com/world/2022/aug/11/Tehran-museum-unveils-western-art-masterpieces-picasso-warhol>.

Here, however, we propose to focus in greater detail on two broader case studies, with similar changes taking place around the country, looking into the fate of contentious cultural heritage the new government decided to readapt following the Revolution. These two most significant shifts considered street names (particularly in the capital city of Tehran) and the sign of the Lion and the Sun.

Case 1: street names after the Revolution in Tehran

The relationship of street names with the matters of heritage, memory and identity is unique: as one of us argued elsewhere, the concept of *mnemotopos* can be used to explain how street names relate to memory.[87] *Mnemotopos* is something that 'manifests the presence of the past, the conscious or unconscious memory traces of a more or less distant period in the life of a culture'[88] and 'streets are particularly interesting examples of *menmotopoi*, because while they exist within the city, the memory of the past which they carry within their name symbolically links the present to the yesteryear, while functionally conveying the intended message of a local or central government.'[89]

Iran, like most countries in similar circumstances, saw significant modifications to its cityscapes following the Revolution, with cultural heritage, due to its abovementioned links to collective memory, particularly impacted by the shift in the official narrative. Beforehand, cities were replete with signs dedicated to the monarchy. In Tehran alone, sixty-six major streets were named after the Shah or his family. The new post-revolutionary regime, to a varying degree, abolished names that did not correspond with the Revolution or introduced place names that characterized Islamic and Iranian identity differently after decades of Pahlavi rule, as the return of the glorious past of Islam and the commemoration of new heroes in public places, demonstrating the process of collective memory inversion.

The first wave of changes aimed to remove the monuments and modify the names of the streets and cities referring to the monarchy. Most statutes relating to the former regime, for example, have already been destroyed during the demonstrations prior to the Revolution, a visible confirmation of the link between a social sense of justice during the transition, collective memory, and contentious cultural heritage. The first formal attempt to change street names happened less than three months after the Revolution when the Interim Government introduced the Municipality Name Designation Council. The Council was tasked with changing the street and monument names, particularly in the capital city of Tehran. It seems that the

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[87]Sadowski (n 2) 214.
[88]Anthony Purdy, 'The Bog Body as Mnemotope: Nationalist Archaeologies in Heaney and Tournier' (2002) 36(1) *Style* 94.
[89]Sadowski (n 2) 214.

Council did not adhere to any legal standard, and decisions made were mostly based on the political ideas of the council members, as it is often at the beginning of a transition, when the need to remove the most blatant examples of the former official narrative supersedes the rule of law. In this first phase, more than five hundred street names were changed. Few main streets kept their original name.[90]

This phase occurred during the continuous crisis mode, when different groups who all allied themselves for the purpose of the Revolution tried to gather as much power as possible. The power grab also extended to each group seeking to commemorate their own heroes, as the power struggle also meant a struggle for power over collective memory and thus the official narrative. However, as one group managed to consolidate power by the end of this period, many streets went through another name change, a particularly good example of which is the case of Mosaddegh Street, further analysed below. Moreover, changes to street names in Tehran during the first wave show that their modifications have been, to a certain level, influenced by the socio-cultural location of streets in different parts of the city.[91]

While the focus of the Pahlavi regime was to name streets after historical monarchs and mostly pre-Islamic figures, as already mentioned above, the new government decided to shift the naming towards the prominent figures of the Islamic history and martyrs of the Revolution, cementing the collective memory inversion in the country's official narrative.

The second phase of renaming streets and other public places occurred during and after the Iran-Iraq war. New heroes (martyrs of the war) emerged, as the government was determined to commemorate the fallen soldiers. One study showed that ultimately almost half of the streets in the capital were named after the fallen soldiers of the war.[92]

During this phase, the first law concerning the naming public spaces was enacted days before the tenth anniversary of the Revolution and a few months before the ceasefire between Iran and Iraq. The Policy on the Naming Streets, Public Spaces and Institutions was adopted on January 24, 1989, once the revolutionary fervour calmed down and the collective memory processes became institutionalized and legalized, as is the case in the subsequent phases of transitional justice. The relatively short law (four articles, three of which were procedural) affirmed the intended message of the new regime:

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[90]Marjan Badiʿi, 'Guftimāni Nāmguẕārīyi Khīābānhāyi Tehran pas az Inqilābi Islāmī' (2009) 5(1) Geopolitic Quarterly 85.
[91]Ibid 80.
[92]Ibid 89.

> [t]he cities of the Islamic Republic of Iran, outwardly and inwardly, should represent the history and geography of Islamic civilisation, and therefore naming officials should use the names of great cultural, literary, and scientific figures in the history of Islamic civilisation, as well as the names of famous cities and places in this civilisation as much as possible [the phrase 'as much as possible' was removed in later revision]. These characters, cities and places should be related to the history and geography of Iran in the first degree and the history and geography of other Islamic countries in the second degree.[93]

The short passage confirms that the government was trying to rebuild an identity as aligned with the Islamic identity. Therefore, most references to pre-Islamic Iran were considered a conflict with this newly defined identity and needed to be erased from the collective memory.

As noted above, right after the Revolution, different political and religious groups played a significant role in changing the name of the streets in Tehran. However, some of the changes supported by these groups were modified again once their power diminished or they were completely removed from the political scene, further proof of the links between power over collective memory and authority over the official narrative.[94] Changes took a more political and religious motivation rather than socio-cultural.[95] For example, Pahlavi Street, the longest street in Iran, changed its name to Mosaddegh Street, the former prime minister of Iran and a prominent member of the National Front. However, when the National Front was weakened in the political scene, the street changed its name again to Valiasr, Shiite's twelfth Imam.

The name changes also reflected the foreign policy of the new regime, another example of the ways in which cultural heritage is used to further particular, often immediate political goals, also on the international stage. In the first renaming period, two important examples of such shifts may be distinguished. The first is related to Iran's relationship with the United States, and the second is related to Egypt. Shah's regime was a very close ally of the United States, and many important streets were named in relation to the US. After the Revolution and severing ties between the US and Iran following the Hostage Crisis, the street names that reflected any connection to the US government or officials were renamed.[96] For example, Kennedy street changed its name to *Tawhid* (Monotheism), Eisenhower to *Azadi* (Freedom), Jordan (named after Samuel L. Jordan, an American presbyterian missionary in Iran) to *Africa*, and Roosevelt Street to *Mofatteh* (an influential cleric assassinated after the Revolution).

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[93]Siyāsati Nāmguẕārīyi Khīābānhā wa Amākāni ʿUmūmī wa Muʾassisāt (The Policy on Naming Streets, Public Spaces and Institutions).

[94]Badiʿi (n 90) 86.

[95]Ibid.

[96]In 1979, a group of students stormed the US embassy in Tehran and took fifty-two Americans as hostage for a period of 444 days. The Iranian Hostage crisis became a political standoff between Iran and the United States with lasting effects on the two countries relations.

The Iran-Egypt relationship is another example of foreign policy affecting street names in Tehran. The two countries had a very close relationship until 1979. After the Revolution, the relations deteriorated for two reasons. The first was the Camp-David Agreement between Egypt and Israel, and the second was the welcoming of the Shah into Egypt after he left Iran. Upon the assassination of Anwar Sadat, the President of Egypt, in 1982 by Khalid al-Islambouli, the Iranian government changed one of the main streets of Tehran (Vozara Street) in the honour of Sadat's assassin. The street name proved to be one of the main hurdles in the normalization of relations between Iran and Egypt in the 1990s and 2000s, when the Iranian authorities agreed to change the name, but the change never took place.

Case 2: removal of the Lion and Sun emblem

The Lion and Sun symbol's history precedes the Pahlavi monarchy by centuries, as it encompasses elements from different traditions in the history of Iran and as such was able to bring together Iranians from diverse backgrounds for a long time. The interpretation of the symbol, including what precisely each element represents, varied significantly throughout history. For example, during the Safavid Persia period (1501–1736), the symbol became one of the most recognized emblems of the country and stood for both state and religion. As such, it became deeply entrenched in Iranian collective memory.

However, despite this vital place in the official narrative and placement on a number of cultural heritage sites, less than three weeks after the Revolution, Khomeini made it clear that for him, the Lion and Sun carried the trauma of the past into the present. He announced that:

> the flag of Iran should not be the flag of the monarchy. The symbols of Iran should not be symbols of the monarchy. They must be Islamic symbols. From all ministries and governmental offices, this ill-fated 'lion and sun' must be discontinued. It must be [replaced with] the symbol of Islam. The symbols of transgression must go. These are signs of transgression. This crown is a trace of transgression, [instead] it must be [replaced with one] of Islam.[97]

Soon afterwards, attempts were made to remove the symbol from all public spaces. However, as we mentioned before, the sign also has had a long history in Iranian collective memory and is associated with Iranian national and religious identity. Despite Khomeini's remarks, the fate of this multisided symbol was debated among government officials, a proof of how difficult it is to initiate a shift in the official narrative in regard to collective memories shared by the broader society. We can find this in the Council of the

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[97]Roohollah Khomeini, Ṣaḥīfiyi Imam (Muʾassisi Tanẓīm va Nashri Aṯāri Imam Khomeini 1999) vol 6, 257.

Islamic Revolution minutes. In the meeting of May 24, 1979, the contentious nature of the symbol was addressed.

We can distinguish two general approaches in the meeting. Some members close to the National Front were against removing the sign from public spaces and considered the emblem to be one of 'national unity.' For them, the symbol was misused by the previous regime, but this did not mean that the symbol was exclusively associated with the monarchy in collective memory. Yadollah Sahabi, in particular, was clear:

> do you want to show the world that we have cut ties with the past or that we like our history? The lion and Sun is a sign of a connection with the past. We are looking for good ties with the past. Removing [the symbol] shows that you want to [cut ties] with everything in the past. The Lion and Sun is related to the Sassanid period, among others.[98]

The other group, i.e. the members of the Islamic Republic party, insisted on rejecting the symbol because of its use by the previous regime. For them, the use was so exclusive during the Pahlavi period that it made it impossible to see the Lion and Sun symbol without remembering the trauma of the injustice that happened in the past, and as such, its removal was necessary to achieve the goals of transitional justice.

Up until this meeting, it was evident that the government's position on the symbol was not clear. However, this changed less than a month after Khomeini made new public remarks regarding the sign. On June 27, 1980, Khomeini once again stressed that 'it has been more than a year and a half since this Revolution, and still the emblems of monarchy exist. If you are a monarchist, state it.'[99] He gave ten days for the authorities to change any sign related to the monarchy.[100] He repeated his point the very next day when he spoke to the members of the Council of the Islamic Revolution and the cabinet. He issued a dire warning about using monarchy symbols in official letterheads.[101] He was clear that the sign has no future in the cultural heritage and collective memory of Iran.

In some instances, the sign needed to be removed or altered from the public spaces that were by themselves symbols of Iranian history. One example regarded the removal of the statues of the Lion and Sun from the gates of the national assembly. However, in other cases, the Lion and Sun reappeared after being taken down or removed from public places. For example, the once painted over signs of the Lion and Sun on the Gate of National Garden were restored in later years, showing the perseverance of

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[98]Mashrūḥi Muẕākirāti Shurāyi Inqilāb (unpublished).
[99]Roohollah Khomeini, Ṣaḥīfiyi Imam (Muʾassisi Tanẕīm va Nashri Aẕāri Imam Khomeini 1999) vol 12, 477.
[100]Ibid.
[101]Ibid 486.

the now counter-memories of pre-revolutionary Iran. However, not all reappearances were permanent. The statues of Lion and Sun located on the gate of the National Assembly returned to their original place in 2008 upon a request of a parliament member, only to be removed two days later without explanation,[102] the once again empty plinths a reminder of, on the one hand, the ways in which shifts in the official narrative affect cultural heritage and, on the other hand, the power of collective memories associated with culture and its objects.

Part 3. Instead of a conclusion: what transitional justice for cultural heritage? Lessons from Iran

Following the 1979 Revolution, Iranian cultural heritage in the form of its street names, monuments and a national symbol faced a fate similar to that of other countries and societies in transition; parallels with the decisions undertaken in post-communist and post-colonial countries[103] to purge the public spaces from objects reminding of the previous regime are self-evident: the first rush of changes, often involving the protesters taking the matters into their own hands, followed by a more legalized and orderly but also deeper changes to the cityscape, with, ultimately, the near complete politicization of the matters, involving almost constant changes and often a certain back-and-forth regarding the intended meaning of certain public spaces.

As noted above, such changes to cultural heritage take place as an element of transitional justice: the visible reckoning with the difficult past when remnants of the fallen regime are dismantled and become a thing of the yesteryear allows the society to work through its collective memories, at the same time strengthening the new, democratic authorities. While removing and or destroying any kind of cultural heritage remains a contentious issue *per se*, the general consensus seems to be that in a transitional situation, the difficult heritage not only can but even needs to be sacrificed at the altar of the new, unified future of the society in question.

Given that Iran did not transform into a fully democratic regime following its transition, the traditional approach to the transitional justice concept should not be applicable. However, as this paper has demonstrated, similar mechanisms follow a transition from one regime to another, whether the end result is a typical, Western liberal democracy or a different type of a regime. Following the oppressive Pahlavi monarchy, just as in the case of transitions from other difficult pasts to promising futures, the people of

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[102]BBC Persian, 'Constitutional valves were removed after 2 days' (2008) *BBC Persian* <https://www.bbc.com/persian/iran/story/2008/08/080813_mg_sunlion?>.
[103]See: Sadowski (n 2).

Iran demanded structural changes to the ways in which the country and society were organized and governed. As such, the abovementioned shifts regarding Iranian public spaces, and thus the country's cultural heritage, soon followed, reflecting the fact that transitional justice mechanisms – at least those regarding the coming to terms with the past – are dissociated from their ultimate goal of achieving democracy and may bring a certain level of peace, security and reconciliation to a society even when it does not achieve complete freedom when the new power takes over.

While the authors of this paper hope that in the case of political transitions from an oppressive regime, full democracy will indeed be the ultimate goal, we would like to stress that, as the case of Iran shows, transitional justice mechanisms take place in different circumstances and may also achieve other, short-term goals that, while not bringing a complete resolution of all the difficult issues, may at least soothe some of the difficult collective memories and plant the seeds for a future reconciliation, and as such transitional justice analyses should not be limited to the classical, Western perspectives but conducted also in other cases, as they may lead to the uncovering of universal mechanisms governing major political shifts.

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