

## **Internalism v.s. Externalism in the Epistemology of Memory**

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### **Introduction:**

We have countless beliefs, and many of them are justified. Most of our beliefs, at any given time, are not occurrent, but are stored in memory. In addition, many of our beliefs remain justified while stored in memory. How is this all possible? An epistemology of memory will in part explain the nature of memorial justification, and how it is possible. Epistemic internalists and externalists disagree deeply about the fundamental nature of epistemic properties like epistemic justification. That is, is justification wholly determined by what goes on inside and from the first-person perspective, or does how beliefs are caused, formed, and what relations subjects bear to their environment prove relevant to whether or not justification obtains? This chapter will first survey general issues in the epistemic internalism / externalism debate: what is the distinction, what motivates it, and what arguments can be given on both sides. The second part of the chapter will examine the internalism / externalism debate as regards to the specific case of the epistemology of memory belief.

## I. The Internalism / Externalism Distinction:

### Intuitive Motivations:

The internalism / externalism distinction in epistemology concerns the question of what kind of factors can contribute to the positive epistemic status of a belief. While one can endorse versions of internalism or externalism for a variety of epistemic statuses, such as epistemic rationality, warrant, entitlement, etc., the focus of this chapter will specifically be on epistemic *justification*.

Justification is taken to be a supervenient property: whether a belief is justified is not a brute fact, but depends upon some further conditions obtaining. Internalists maintain that all the factors upon which justification depends are internal, either in the sense of being reflectively accessible to the subject, or by being the agent's mental states. Externalists deny this. The versions of internalism or externalism that epistemologists have tended to endorse have been shaped by reactions to at least two kinds of central thought experiments: those that aim to show that paradigmatically external factors, such as causal relations or the reliability of the method that gave rise to the belief, are not *sufficient* for justification, and those that aim to show that such factors are not *necessary* for justification. Reactions to these cases have also influenced the positive accounts of justification offered. The two kinds of thought experiment are as follows:

- i) *Is reliability sufficient for justification?* Actual and possible cases of blindsight (e.g. Smithies 2014), serendipitous brain-tumors (e.g. Plantinga 1993), chicken-sexers (e.g. Foley, 1987, pp. 168-170<sup>1</sup>) and clairvoyance

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<sup>1</sup> Epistemologists often refer to the chicken-sexer case, but almost never attribute it to anyone. To the best of my knowledge, the earliest mention of the case is Goldman (1975). See especially pp. 114-116.

(e.g. Bonjour 1980; 1985) share this basic structure: unbeknownst to the subjects, they have highly reliable belief-forming processes that produce and sustain true beliefs regarding some subject matter. The subjects are not aware that they have this ability, and nor are they aware of how they could have reliably true beliefs on that topic. In addition, the subjects are not aware of any reasons to think that the belief is true. For example, take this classic description of such a case by Laurence Bonjour:

Norman, under certain conditions that usually obtain, is a completely reliable clairvoyant with respect to certain kinds of subject matter. He possesses no evidence or reasons of any kind for or against the general possibility of such a cognitive power or for or against the thesis that he possesses it. One day Norman comes to believe that the President is in New York City, though he has no evidence either for or against this belief. In fact the belief is true and results from his clairvoyant power under circumstances in which it is completely reliable. (Bonjour 1985, 41)

One can then ask about such cases: are the beliefs of such subjects, for example, justified?

If one were to answer “yes”, then one is likely expressing externalist sympathies. One might reason as follows: after all, the aim of belief is truth, and the beliefs in question are not accidentally true, but are reliably produced. Therefore these beliefs have a lot going for them, from an epistemic point of view, which implies that they are justified.

If one were to answer “no”, that such beliefs are not justified, then one will hold that justification must be more than reliably produced belief. But what is missing in such cases? What would need to be added to such cases to make them cases of justified belief? So-called epistemic internalists

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Very interestingly given his later process reliabilist views (e.g. 1979), Goldman (1975) argues that the case is one of knowledge, but *no* justification.

tend to stress that what is missing is the involvement of the subject's point of view, the first person perspective. According to a traditional sort of epistemic internalism, what needs to be added is some kind of *awareness* on the subject's part of something like reasons, grounds, or evidence to think that the contents of their beliefs are true. More on what form that awareness might take, and what one must be aware of, will be discussed below.

- ii) Is reliability necessary for justification?* The other kind of thought experiment that has tended to move people in the internalism /externalism debate is versions of what has become known as the New Evil Demon problem (for the original presentation of the New Evil Demon problem, see Cohen 1984; Lehrer and Cohen 1983. For an overview, see Littlejohn 2009). A common version of the New Evil Demon problem is based on drawing new morals from an old thought experiment. Like the evil genius that Descartes introduces in the context of discussing skepticism, the New Evil Demon problem proceeds from a similar set-up. We are asked to consider a world where a powerful evil demon (or in some variations, super scientists controlling brains in vats) is radically deceiving the inhabitants of that world in a systematic way such that their perceptual experiences are largely hallucinatory, and their beliefs about the external world based on these experiences are by and large false. Despite this, from the subjects' own point of view, things seem exactly as they would if their beliefs were by and large veridical. Unlike Descartes', which concerns skepticism and the possibility of knowledge, the new question is an evaluative question

about the presence and nature of justification. That is, do we judge that the victims of the evil demon are *justified* in believing as they do? If they are justified, do they share sameness of justification with their non-deceived counterparts?

Traditional internalists have registered the judgment of sameness of justification, from which one can conclude that external factors like the reliability of the process that gave rise to a belief, or the truth of those beliefs, or whether or not one's perceptual experiences are veridical, are not necessary for justification, since the demon can ensure that the subjects' beliefs are utterly unreliable by, among other things, systematically ensuring that their beliefs are always false. Internalists often draw a positive moral from such cases: whatever else justification must be like, it is constrained by principles which hold that internally alike counterparts must also be counterparts in justification: the same beliefs are justified for each of them, and to the same extent.

Those with externalist sympathies have tended to judge that victims of the New Evil Demon lack justification for their beliefs, or if they are justified, then to a lesser degree than their normal-world counterparts. Some externalists concede that while the beliefs of the radically deceived in the demon world might have other possible virtues, such as for example, being blamelessly held, they contend that such beliefs lack justification (e.g. Littlejohn 2012; Pritchard 2012).

Depending on how one responds to the above two cases, one ends up with increasingly internalist or externalist views about the nature of epistemic justification.

## How Should We Understand the Epistemically “Internal”?

In response to the above test cases on whether factors like reliability are sufficient for justification, some internalists have held that what is missing is any essential involvement of the subject’s point of view. On one way of construing this requirement, what needs to be added is some kind of (actual or potential) *awareness* on the subject’s part of something like reasons, grounds, or evidence to think that the contents of their beliefs are true. Awareness is usually taken to be a form of consciousness. But if an internalist does not demand actual awareness, they might still hold that a subject must have the disposition to be consciously aware of the grounds of their belief, if they reflected upon them. Intuitively, as an internalist might put it, what Norman needs to be justified in believing that the President is in New York, is to be aware of some kind of reason or evidence that counts in favor of believing that the President is in New York. For example, Norman could see a news report to that effect, or some other kind of testimony. In the absence of being aware of any such considerations, then from Norman’s point of view, his belief is completely groundless. There is dispute among internalists of what a subject must be consciously aware of in order to hold a justified belief. Some options present themselves<sup>2</sup>:

- a)      Grounds: Whether one is justified in believing that  $p$  supervenes on facts which one is in a position to be consciously aware of. In order for a fact to contribute to justification, its content must be accessible to the agent. This position has been called “Simple Internalism” (Pryor 2001) (and in another form, “Internalist Externalism” (Alston 1989a).

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<sup>2</sup> See Madison 2010 for these options and others on how exactly to construe the internalist’s awareness requirement.

b) Adequacy of Grounds: *Access Internalism*, by contrast, maintains that one always has ‘special access’ to one’s justificatory status (where ‘access’ and ‘conscious awareness’ are often used interchangeably). So unlike simple internalism which only requires access to the contents of one’s grounds, access internalism in addition insists that all of one’s justified beliefs are such that not only are one’s grounds accessible, but also that the grounds are adequate (e.g. Bonjour 1985; Chisholm 1989). Simple Internalists do not affirm this latter claim. For example, an Access Internalist in this sense will insist that for Norman to be justified in believing that the President is in NYC, it is necessary that he is aware of some reason to think that the President is NYC, and in addition, that it is necessary that he is also able to determine through reflection alone (which is usually taken to be restricted to introspection and a priori reasoning) that this reason justifies his belief about the President’s whereabouts.

The other main way of understanding the epistemically internal has become known as Mentalism. Mentalists do not stress the epistemological significance of conscious awareness. Instead, they construe the epistemically internal as internal to the subject’s mind in the sense of holding that epistemic justification depends wholly on the subject’s mental states. Ralph Wedgwood (2002; forthcoming) offers a version of Mentalism about epistemic rationality: he argues that what is rational to believe supervenes on one’s *non-factive* mental states<sup>3</sup>. Richard Feldman and Earl Conee, the

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<sup>3</sup> A factive state is one that entails the truth of its content. For example, most philosophers hold that knowledge is a factive state: if one knows that P, then P is true. Non-factive states are those whose content can be false. For example, belief is not factive: one can believe that P, even if P is false. In response to New Evil Demon cases, most Mentalists hold that justification is determined by kinds of mental states that can have false content.

chief advocates of Mentalism, define Mentalism as the thesis that “a person’s beliefs are justified only by things that are internal to the person’s mental life” (Feldman and Conee 2001, 233). Specifically, their official formulation of Mentalism is as follows:

S: The justificatory status of a person’s doxastic attitudes strongly supervenes on the person’s occurrent and dispositional mental states, events, and conditions. (Ibid., 234)

This statement of Mentalism, unlike Wedgwood’s, allows for *factive* mental states / events / conditions to serve as justifiers. From this formulation, they express the main implication of S as follows:

M: If any two possible individuals are exactly alike mentally, then they are alike justificationally, e.g., the same beliefs are justified for them to the same extent. (Ibid.)

They take it that this latter claim simply spells out a consequence of their supervenience thesis S.

There are different ways of arguing for Mentalism. Wedgwood appeals to versions of the New Evil Demon cases introduced above in arguing for Mentalism: if normal world subjects and their radically deceived counterparts are equally justified, then what best explains this is that they are mentally alike (Wedgwood 2002; forthcoming). Wedgwood suggests that it makes no difference to which beliefs are rationally held whether or not the subject’s experiences are veridical or whether the beliefs based on those experiences are true or false.

Feldman and Conee offer their view as the best explanation of intuitive judgments about cases they provide (e.g. Conee and Feldman 2001). In defending Mentalism, pairs of cases are introduced where Feldman and Conee invite the intuition that in the first instance the subject has a justified belief and in the second case the belief is

intuitively not justified, or else one belief is more justified than the other. They also contend that the best explanation of these apparent epistemic differences is that there are “internal” differences in their preferred sense of internal to the subject’s states of mind. Reflecting on these cases and those like them, Feldman and Conee argue that epistemic internalism, understood as Mentalism, is true: justification supervenes on the mental; there can be no justificatory difference without a mental difference.

Having introduced the two broad families of thought experiment that tend to divide epistemologists in the internalism / externalism debate, we can now appreciate a broad spectrum of possible views. Depending on whether external factors, such as the reliability of the process that gives rise to the belief, are held to be necessary and / or sufficient for justification, the following possibilities emerge:

Reliability Necessary?	Reliability Sufficient?	Possible View:
YES	YES	Strong Forms of Process Reliabilism: a belief is justified if and only if it is the product of a reliable belief forming process.
YES	NO	<ul style="list-style-type: none"> <li>- Weaker Form of Process Reliabilism: a belief is justified only if it is the product of a reliable belief forming process, and no undefeated defeaters are present. However, no positive evidence in support of the belief is required (e.g. Goldman 1979, 1986).</li> <li>- Forms of Evidential Externalism: <ul style="list-style-type: none"> <li>i) Indicator Reliabilism / Internalist Externalism: a belief is justified only if it based on a truth-conducive ground (e.g. Alston 1989a).</li> <li>ii) Epistemological Disjunctivism: a belief is justified only if it is based on a factive ground, and this ground must be accessible to the subject upon reflection (e.g. Pritchard 2008, 2011, 2012; and arguably McDowell 1998a, 1998b, 1998c).</li> </ul> </li> </ul>
NO	YES	No known advocates.
NO	NO	<p>Strong Forms of Internalism:</p> <ul style="list-style-type: none"> <li>i) Mentalism: justification supervenes on the mental in that there can be no difference in justification without a mental difference (e.g. Feldman and</li> </ul>

		<p>Conee 2001; Wedgwood 2002).</p> <ul style="list-style-type: none"> <li>ii) Traditional versions of Access Internalism: the conjunction of Mentalism + an awareness requirement, such as one must have reflective access to the adequacy of one's grounds (e.g. Chisholm 1989; Bonjour 1985; Steup 1999).</li> <li>iii) Internalist Coherentism: a belief is justified just in case it coheres with other beliefs in one's noetic structure. Authors vary on how to understand the notion of coherence, but it is often taken to include some kind of <i>explanatory</i> relation between doxastic states (e.g. Bonjour 1985; Lehrer 2000; Poston 2014). For more on the issue of coherentism in the epistemology of memory, see chapter 25 in this volume.</li> <li>iv) Phenomenal Conservatism: a belief is justified only if it based on a <i>seeming</i>, e.g. seeming that P provides <i>prima facie</i> justification to believe that P (see Huemer 2006, 2007, 2013. For criticism see Littlejohn, 2011; as well as a number of papers in Tucker, 2013).</li> </ul> <p>So understood, Phenomenal Conservatism is a form of Mentalism, and Phenomenal Conservatives can differ on whether the subject must be aware of the seeming, or merely require the justified belief to be based on the seeming. For more on the issue of phenomenal conservatism in the epistemology of memory, see chapter 24 in this volume on foundationalism.</p>
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### Theoretical Motivations:

Besides the cases of clairvoyance and their ilk and New Evil Demon considerations, what other kind of arguments can be given for and against different forms of internalism and externalism? As part of a theoretical defence of internalism, one might appeal to considerations of epistemic value. From the premise that epistemic justification is of value, one might argue that justification has to have a certain nature to account for such value. For example, if part of the value of justification comes from allowing a certain kind of rational defensibility, then this

might require conscious awareness of grounds or reasons that can be appealed to in defence of one's beliefs (for the view that epistemic rationality is linked to a kind of idealized rational defensibility from the first-person perspective, see Foley 1987; 2001).

On the other hand, externalists might also draw on considerations of what they take to be of epistemic value in motivating their theory of justification. It is a widely held assumption among philosophers - with very different accounts of the nature of justification - that what individuates epistemic justification from other kinds of justification is a connection to *truth*. Truth is commonly taken to be a fundamental epistemic value. For example, reporting on the views of Alvin Goldman, Richard Fumerton writes the following:

The fundamental idea behind Goldman's reliabilism is straightforward enough. When a belief is justified it has a virtue. There is something good about it. From the epistemic perspective, virtue has to do with *truth*. The reason epistemologists want epistemically justified beliefs...is that having justified beliefs has *something* to do with having true beliefs. At the same time, we can understand justification in such a way that we allow the possibility of justified false belief...The answer is to focus on the processes that produce beliefs. (Fumerton, 1995, p.97)

So an advantage of externalism is clear: externalists can give a straightforward account of the relationship between justification and truth.

Internalists tend to have much more difficulty on this score. Given a commitment to the New Evil Demon thesis, it is perfectly consistent with that form of internalism that a subject could have fully justified but systematically false beliefs. However, a potentially devastating problem now arises for any such account of epistemic justification: in what way is the internalist's alleged epistemic justification really epistemic, if it is consistent with having massively false beliefs? After all, what of the general commitment that epistemic justification must admit of a connection to

the truth? A natural worry is that whatever form the truth-connection might take, the possibility of massively false, but perfectly justified beliefs, is inconsistent with there being a genuine and substantial connection between justification and truth. In short, the internalist owes us an account of the connection between justification and truth.

Another strategy taken by some internalists in motivating their view asserts that justification is a deontological notion, and that meeting one's epistemic duties and obligations requires awareness of one's justifiers (for discussion, see Plantinga 1993; Alston 1989b; see also the collection of essays in Steup 2001). Relatedly, epistemic justification has been thought to be closely related to notions of epistemic responsibility, and that such responsibility implies internalism (e.g. Foley 2005). Finally, if one adopts a guidance conception of justification, in that justification is supposed to guide one in what to believe and ultimately what to do, then one might think that this implies that one must have access to one's grounds if one is going to be able to deliberate on what to believe (see Goldman 1980 for a discussion of the regulative v.s. the theoretical conceptions of justification and its implications for the internalism / externalism debate).

An important obstacle for epistemic internalism, which is most often pressed against forms of internalism that appeal to conscious awareness or other higher-level requirements, is the charge that it entails various kinds of scepticism. For example, internalism has been thought to be too demanding in various ways. Some have charged that internalism over-intellectualizes justification in ways that imply that animals, small children, and the intellectually unsophisticated would lack justification for their beliefs (e.g. Goldman, 1986, p. 62; Alston 1989c, p. 164; Burge 2003). This constitutes an objection on the assumption that animals, small children, and the intellectually unsophisticated have the capacity for having beliefs that specifically

enjoy epistemic justification (instead of other epistemic statuses, such as knowledge, warrant, etc.). An externalist might draw on cases of animals, small children etc. as the basis of positive arguments in support of their preferred externalist epistemology (e.g. Kornblith 2002 argues that the study of the science of animal behaviour supports an externalist theory of knowledge and justification). Both sides of the debate take it as a constraint on an adequate theory of epistemic justification that the account advanced needs to be psychologically plausible, so the theory of justification advanced should not presuppose abilities or capacities that normal epistemic agents do not possess.

A related family of objections holds that internalism entails scepticism in another way. In particular, a common objection is that access internalism specifically generates vicious regresses. If a justified belief requires awareness of a reason, does that awareness itself need to be justified? If so, does that not require a further state of awareness, which in turn calls out for justification? For example, Michael Bergmann (2006) argues that the awareness requirement that some hold defines epistemic internalism generates a dilemma: either it leads to both a vicious regress of token mental states, as well as a vicious regress of mental states with increasingly complex, and hence unthinkable, content, or else it is entirely unmotivated. As a result, Bergmann argues, epistemic internalism, the awareness requirement, and the intuitions that motivate it, must be abandoned, despite any initial plausibility. For some responses to Bergmann's Dilemma, see Rogers and Matheson (2011) and Moretti and Piazza (2015).

A final general worry about epistemic internalism is that it cannot provide a satisfactory answer to the problem of radical scepticism. Radical scepticism says that knowledge of the external world is impossible, but pre-theoretically, we have the

deeply rooted common sense intuition that we have such knowledge. Scepticism can be seen as a paradox, since seemingly good arguments can be given from seemingly true premises for the seemingly unpalatable conclusion that knowledge is impossible. One might generalize these arguments to target not only knowledge, but also epistemic justification. John Greco, for one, has argued that given the form of sceptical arguments, the problem of radical scepticism can only be solved by appeal to epistemic externalism (Greco 2000). Greco argues that it is the internalist's insistence on internally accessible grounds for their beliefs that give traditional sceptical arguments their force. He argues that we must adopt a form of epistemic externalism if we are going to be able to solve the problem of radical scepticism.

Depending on one's views of the methodological role of scepticism in epistemological theorizing, one might follow Greco and take the issue of responding to scepticism as a general objection against internalism. As an argument against internalism is often therefore an argument in favour of externalism, appealing to the problem of scepticism can be used directly as an argument in favor of one's preferred brand of externalism. On the other hand, one might take the relative ease in which externalist views handle the problem of scepticism to count against externalism. The argument would be that philosophical scepticism is a deep and important problem, but externalist responses trivialize it, and as such should be rejected (e.g. Stroud 1994; Fumerton 1990). For more on the general issue of skepticism as applied to memory, see chapter 27 in this volume by Andrew Moon<sup>4</sup>.

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<sup>4</sup> For further general reading on the internalism / externalism debate, see Kornblith (2001); Pappas (2005); Poston (2008); Madison (2010). In addition, an up-to-date bibliography on the epistemic internalism / externalism distinction is maintained on PhilPapers at <http://philpapers.org/browse/epistemic-internalism-and-externalism>

## **II. The Justification of Memory Belief:**

With a taxonomy of some of the possible positions in the epistemic internalism / externalism debate, as well as a survey of some of the motivations for and against such accounts, we can now turn to the specific issue of the justification of beliefs stored in memory. Our primary focus here shall be on what has been called propositional, factual, or semantic memory (for discussion of kinds of memory, see chapter 1 in this volume by Markus Werning and Sen Cheng). Here what one remembers is a fact or a proposition: for example, I remember that my car broke down in the desert (for discussion of the objects of memory, see chapter 8 in this volume by Jordi Fernandez). While I can consciously entertain my belief that my car broke down in the desert, most of the time such beliefs are retained in memory. Commonsense assures us that such beliefs are justified not only when they are occurrent, but also when stored in memory. But what accounts for the justification of memory belief?<sup>5</sup>

### **Internalist Accounts of Memorial Justification:**

Epistemic internalists who insist on a reflective accessibility requirement on justification might begin by appealing to what has been called episodic or experiential memory. Unlike propositional memory where what one remembers is a fact, the object of episodic memory is an experience. For example, if one's car broke down in the desert last weekend, one might be able to remember the breakdown: one is able to call to mind the experience of seeing or being in the car, an experience that might be accompanied by sensuous imagery. If an internalist holds that conscious perceptual

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<sup>5</sup> For further general reading on the epistemology of memory, see Senor 2014; Frise 2015.

experiences justify belief, here memory retains both the belief and its justifying experiential ground. Here one is able to recall the experience of the breakdown, which in turn might be thought to justify one's belief that the car broke down.

Such an approach might fit most naturally within an Evidentialist framework. In its most general form, Feldman and Conee, champions of both Mentalism and Evidentialism, define Evidentialism as follows:

ES The epistemic justification of anyone's doxastic attitude toward any proposition at any time strongly supervenes on the evidence that the person has at the time. (Conee and Feldman, 2004, p. 101)

As perceptual experience is normally understood by Evidentialists as evidence, they might similarly hold that episodic memory can serve as evidence for the propositional memory based upon it.

It has been widely noted, however, that as time passes and memory fades, often subjects' retain their beliefs, but they lose the experiential or episodic grounds on which they were based. Perhaps most of our memory beliefs are like this; I have a dizzyingly wide array of factual beliefs stored in memory, but if pressed, I often cannot recall how, when, or on what basis I formed these beliefs. On pain of skepticism, we nevertheless take at least most of these beliefs as epistemically justified. For example, I am quite sure both that Napolean was born in Corsica, and that if I reflect on why I think that is true, there is very little, if anything I could call to mind in its support. My belief that Napolean was born in Corsica is justified nonetheless. Epistemic internalists face the problem of explaining how such justification is possible. The so-called Problem of Forgotten Evidence is one of the major challenges facing internalists (for recent sample presentations of the problem, see Goldman 2001; Williamson 2007; Bernecker 2010, p. 72).

At this point internalists within the Evidentialist tradition might broaden their conception of what evidence is available in support of our beliefs. Recall that Phenomenal Conservatism holds that, roughly, a seeming that P confers *prima facie* justification to believe that P. Some have argued that in cases of forgotten evidence, one still often *seems to remember* that P (Feldman and Conee 2001; Fumerton 1995; Pollock 1986; Madison 2014). To return to our earlier example, while I might not be able to recall any direct ground for my belief that Napoleon was born in Corsica, I might seem to remember that I learned this fact. Seeming to remember having learned something might be thought of as some evidence that one did indeed learn it. Even if I cannot seem to remember that I learned a particular fact, I often have the experience of seeming to remember it when it is called to mind. Seeming to remember that P has a distinctive feel; it is not like wishing, hoping, or seeing that P (for discussion of the phenomenology of memory, see chapter 2 in this volume by Fabrice Teroni).

A worry for phenomenal conservative responses to the Problem of Forgotten Evidence is that this approach has the consequence that forgetting one's evidence, which seems like a kind of epistemic shortcoming, can actually improve one's epistemic position in objectionable ways (see for example Huemer 1999 sec 2; Senor 1993). Suppose that one's original ground for one's belief that Napoleon surrendered at Waterloo was that one heard it in an Abba song. At that time one's belief was unjustified. Over time, however, suppose that one forgets that one acquired this belief in this way. Even though one has forgotten one's original basis, suppose that one now has the experience of seeming to remember that the belief is true. Does merely seeming to remember that Napoleon surrendered at Waterloo now justify that belief?

Internalists of some stripes will argue yes: just as defeating defeaters can

positively affect justification, losing defeaters by forgetting them can have the same positive effect (e.g. Madison 2014). On the other hand, in response to this kind of case, many externalists will argue that memory cannot improve, or especially generate justification, where formerly there was none. For more on the general issue of whether memory can generate positive epistemic status, or whether it merely preserves it, see chapter 26 in this volume by Thomas D. Senor on Preservationism vs. Generativism in the epistemology of memory.

A closely related worry has been called the “epistemic boost” problem (e.g. Huemer 1999; McGrath 2007 discusses a version of this problem for conservative approaches in epistemology more generally). The worry is another way of expressing the concern that phenomenal conservative approaches to memory would allow the counterintuitive result that the process of remembering can “boost” the justification a belief had, over and above the justification one originally had for it. The worry is this: one might think it implausible that each and every time a belief is retrieved from memory it receives an extra epistemic boost due to the epistemic import of the experience of seeming-to-remember, over and above the belief’s initial good grounds.

Sven Bernecker expresses the objection thus:

Suppose that S initially comes to believe that P by means of an a priori proof. The next day S still remembers P and the proof of it. But since he also has the experience of seeming to remember that P, he now has *two* reasons for holding P true, an inferential and a foundational one. Thus S has more justification for P now than he had at the original learning. (Bernecker, 2008, p. 120)

Even if one does not allow that memory can generate justification where previously there was none, the question is now whether memory can enhance or raise justification, or whether the epistemic role of memory is purely preservative. For a possible response to this problem in terms of explaining away the potential oddness by appealing to different senses in which justification can be increased, see Madison

2014, pp. 50-52 (for a sample of two other possible responses to the epistemic boost problem, see McGrath 2007, pp. 20-21).

### **Externalist Accounts of Memorial Justification:**

With one's preferred externalist theory of epistemic justification in hand, its application to the case of memory belief is quite straightforward. Take a case of forgotten evidence, such as one's belief that Napoleon was born in Corsica. This kind of case poses the greatest difficulties for internalist theories of justification. But these cases on the face of it can be handled quite easily by externalist epistemologies. To see this, suppose that one learned the fact that Napoleon was born in Corsica from a highly reliable textbook as a child, with the help of an equally reliable teacher. But as decades have past, one can no longer call to mind how one formed this belief, or any reason to think it true. We might judge that the belief may well be epistemically justified. How is this to be explained?

To take one form of epistemic externalism, the process reliabilist can hold that a belief is justified just in case it is the product of a reliable belief forming method (e.g. Goldman 1979, 1986). If the textbook and competent teacher are part of a reliable method in the right kind of way, then one's belief about the birthplace of France's first emperor is justified, regardless of whether or not one now has access to one's original grounds.

Or if an externalist rejects simple forms of process reliabilism, they might opt for a form of Virtue Epistemology, and generalize it to the case of memorial justification. For example, one might hold that justification arises as a result of the operation of reliable epistemic virtues or cognitive faculties (for a survey on various forms of virtue epistemology, see for example Battaly 2008). So assuming that the

faculty of memory is by and large reliable on matters like this, and assuming it is virtuously deployed when one recalls that Napoleon was born in Corsica, then one might argue that that belief thereby enjoys epistemic justification. The application of different externalist accounts to the case of memorial justification will share the virtues and vices of such approaches generally.

In addition to specific externalist accounts of epistemic justification applied to the case of memory belief, it is worth noting a family of externalist views particular to the case of memory that have been called Preservationism. According to such views, just as memory preserves beliefs, memory also preserves whatever justification a subject originally had for those beliefs. So, for example, if a belief was formed by a reliable belief forming process, one might argue that, in the absence of defeaters, that epistemic goodness can be preserved by memory, even if one cannot now recall on what basis this belief was held (if one ever could). For defences of Preservationism in the epistemology of memory, see Annis (1980); Malcolm (1963); Naylor (1983); Burge (1993); Owens, (2000).

New Evil Demon style cases can be presented against Preservationism, and so it is incompatible with those forms of internalism that embrace the New Evil Demon intuition. Take a subject S and her recently envatted counterpart S\*; both seem to remember that P, and on that basis believe that P. Suppose however that one subject is enjoying a veridical memory experience, whereas the other is merely seeming to remember that P, but this experience is entirely illusory thanks to the demon's intervention. Do the two subjects share sameness of justification? Internalists with their commitment to the New Evil Demon case will maintain yes, and so conclude that memory justification cannot just be a matter of preserving whatever justification the subject originally had. Michael Huemer makes a similar point in terms of Bertrand

Russell's well known five-minute hypothesis, i.e. the hypothesis that the world was created five minutes ago, replete with all of one's apparent memories (1999, p. 350).

Internalists will hold that the subjects of the five-minute hypothesis will be just as justified in beliefs as their subjectively indistinguishable counterparts who enjoy a genuine past. Whether this constitutes an objection to Preservationism will depend on how one responds to the New Evil Demon problem more generally.

While externalists might have more straightforward ways of accounting for the justification of memory belief, hopefully it has been shown that internalists are not without resources to respond to this challenge. What still remains at an impasse, however, is how to resolve the deep general debate between internalists and externalists on the fundamental nature of epistemic justification<sup>6</sup>.

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