

## THE EPISTEMOLOGICAL DISUNITY OF MEMORY\*

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The idea that our confidence in memory, which explains many if not most of the judgements we make, is systematically misplaced constitutes one of the most extreme and counterintuitive forms of scepticism. Intuitively, it seems obvious that memory judgements can be and typically are justified and this intuition has been happily endorsed by the vast majority of philosophers interested in the epistemology of memory. Yet, consensus ends here and the question as to what justifies memory judgements has generated a long-standing debate between two approaches. On the one hand, the ‘Past Reason Theory’ (e.g. Annis 1980, Malcolm 1963, Naylor 1985, Senor 1993) has it that memory judgements are justified by the reasons one had to make these judgements. What justifies your memory judgements are those reasons you had to make them in the first place. On the other hand, the ‘Present Reason Theory’ (e.g. Audi 1995, Chisholm 1989, Ginet 1975, Pollock 1974) defends the claim that these reasons are to be found at the time memory judgements are made. What justifies your memory judgements are reasons you have now that you remember. Is it possible to resolve this debate?

As opposed to previous treatments of this issue, my argument shall be that, far from being exclusive, these two approaches are needed to account for the justification of different kinds of memory judgements. For that reason, one outcome of my discussion is that memory judgements exhibit no epistemological unity. I shall proceed as follows. I first introduce the distinction between episodic and semantic-propositional memory and explain the epistemological import of some influential suggestions as to how we should draw this distinction. Next, in section 2, I argue that the Present Reason Theory fails to account for the epistemology of propositional memory and suggest that this failure traces back to its relying on a distinctive form of internalism. And this, I maintain, supports the

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\* This paper is the descendent of Kevin Mulligan’s suggestion that I might be interested in working on memory, but I guess I am the only person still episodically remembering that event. It is in any case a modest tribute to what I learnt from him. Happy birthday, Kevin!

Past Reason Theory as an account of propositional memory judgements. Yet, it would be wrong to think that this conclusion carries over to the epistemology of episodic memory: as I argue in section 3, the Present Reason Theory offers here a much more sensible account. Finally, in the fourth section, I suggest a way of resolving the debate between Past and Present Reason Theories.

## 1 PROPOSITIONAL AND EPISODIC MEMORY

It is customary for psychologists (e.g. Tulving 1972 & 1985, Perner 2000, Perner & Ruffman 1995) as well as for philosophers (e.g. Dokic 1997, Hoerl 2001, Martin 2001) to draw a contrast between propositional-semantic memory and episodic memory. The import of this distinction can be measured if we focus for a moment on two kinds of memory reports. ‘John remembers that Dreyfus was innocent’ and ‘June remembers that Masaccio painted the *Cappella Brancacci*’ are typical reports of propositional memory. In these reports, ‘to remember’ is followed by ‘that’ clauses and one of their salient features lies in the fact that they extend well beyond events the subject witnessed or objects with which he has been acquainted. Reports such as ‘Mary remembers her first meeting with her boss’ and ‘Jim remembers an awful accident’ are typical reports of episodic memory. In such reports, the verb is not followed by ‘that’ clauses. One salient feature of these reports consists in the fact that they are, as opposed to propositional memory reports, limited to events the subject has witnessed and objects with which he has been acquainted. This is why propositional memory reports are not easily turned into episodic memory reports. It would for instance be inappropriate to say of June, born in 1980, that she remembers Masaccio painting the *Cappella Brancacci*.

How should we draw the distinction between propositional and episodic memory? Here are three attempts to do so that have proved particularly influent. One approach has it that the presence of information about where and when something happened is the distinctive mark of episodic memory (Tulving 1972). Another approach suggests that what is specific of episodic memory is the presence of information about the self (Howe 2000). Finally, some have attempted

to draw this distinction by appealing to the complex metarepresentational content referring to a past experience that is claimed to be distinctive of episodic memory (Dokic 1997, Perner & Ruffman 1995).

These theses about episodic memory will not be my main focus in what follows, but they help pin down two recurrent features of discussions of episodic memory that will prove important to disentangle some of the epistemological problems that lie ahead of us. First, the distinctiveness of episodic memory is claimed to reside in its subject matter – be it a past context, the self or a past experience: episodic memory is (typically at least) constituted by a past-tensed judgement about the relevant subject matter. Second, these theses implicitly assume that propositional and episodic memory are epistemologically on a par. This may well be motivated by what I just said. For if episodic memory differs from propositional memory only insofar as the relevant judgements have a different subject matter, the difference may prove epistemologically inconsequential. This assumption can be questioned, however. And, as we shall see, investigating the epistemological issues surrounding memory provides some reasons to reject it. Let me start by propositional memory.

## 2 PROPOSITIONAL MEMORY

Propositional memory reports – ‘John remembers that Dreyfus was innocent’ – have a clear epistemic import. We see John as, *ceteris paribus*, justified to judge that Dreyfus was innocent if he so remembers. Yet, in virtue of what are these memory judgements justified? I shall start by investigating how this question can be answered within the Present Reason Theory, which you will remember is the claim that the relevant reasons are to be found at the time memory judgements are made. If one subscribes to this theory, three ways of answering this question might be pursued: one may appeal to memory impressions, to some sort of inference or to the subject’s beliefs about the source of his judgement. Let us see how these answers proceed, starting with the most intuitively appealing one.

### 2.1 *Memory impressions*

We are all accustomed to the fact that judgements sometimes strike us as, to put it loosely, ‘coming from the past’. ‘It just seems to me that I remember that p’, ‘I have the impression that I remember that p’ is how we typically express this fact. This appears to support a quite appealing idea: when one remembers that p, what justifies one in judging is one’s seeming to remember that p. This claim is distinctive of what I shall call the *Memory Impression Theory* or, for short, MIT (Pollock 1974, Pollock & Cruz 1999: chap. 2). This theory qualifies as an instance of the Present Reason Theory, since the memory impressions that justify memory judgements take place at the time these judgements are made.

Now, what exactly are these ‘impressions’ or ‘seemings’? They should not be assimilated to judgements about our source for judging that p (Pollock 1974: 191). That is, the impression to remember that Dreyfus was innocent does not consist in John’s additional judgement e.g. that he learnt this in a serious book, but is a distinctive phenomenological state. Let me grant this.<sup>1</sup> Next, note that if these impressions may be more or less intense, they are difficult to tell apart from one another. The seemings of seeming to remember that Dreyfus was innocent and seeming to remember that Napoleon crossed the Alps do not differ very much and this explains why advocates of MIT suggest that there is one sort of impression that simply gets attached to different contents.

The Memory Impression Theory offers an intuitively appealing account of justified propositional memory judgements, but it faces some significant difficulties. Let me start by observing that these memory impressions are often quite elusive. They do not accompany, for instance, many of our judgements about historical events. This is not in itself a problem for MIT, which can claim that these judgements are for that very reason unjustified. The problem is rather that the boundary between what is and what is not accompanied by these impressions hardly corresponds to the one we intuitively draw between justified and unjustified memory judgements. On the one hand, it would be preposterous

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<sup>1</sup> If you disagree, this means that MIT does not constitute an alternative to the Source Monitoring Theory I discuss below.

to assess John's judgement that Dreyfus was innocent as unjustified simply because it is not accompanied by a memory impression. And, on the other hand, the presence of such an impression does not dispose us to think favourably of Max's judgement that aliens have landed in his backyard. Yet, Pollock argues that MIT has one advantage that might offset these serious misgivings:

The recollection adds something to the belief. My having the recollection tags the source of the belief as being memory rather than present calculation or the result of reading the value off a table presently before me or simply pulling the number out of the air at random. (Pollock 1974: 189)

The argument is that memory impressions are needed in order for the subject to distinguish memory from other sources of belief or judgement. And it is true that, when trying to remember whether *p*, we sometimes eventually get a memory impression. Still, most propositional memory judgements arise spontaneously in answers to questions and are not prefaced by such tryings. And in these cases, no distinctive phenomenal impression is to be found: one spontaneously passes the judgement without being aware of a present source for making it. This is enough to be able to 'tag the source of the belief as being memory'. Distinguishing in propositional memory a memory impression that *p* and the judgement that *p* often does not correspond to any phenomenally salient fact (Locke 1971: 38, Naylor 1985).

We can now make use of these observations to build a dilemma. Either MIT persists in requiring memory impressions for justification, or it is modified so as to appeal to no more than the spontaneity of propositional memory judgements. The first horn is not attractive: it has, as we have seen, serious revisionist consequences regarding our intuitive grasp of the distinction between justified and unjustified memory judgements. The second horn is no more attractive. For the spontaneity of a judgement does not contribute in any way to its justification: Max's judgement that aliens have landed in his backyard remains unjustified despite its being spontaneously passed. The fact that many propositional memory judgements are made spontaneously does not help explain why they are justified. But MIT, appealing in the way it does to the circumstances surrounding the

memory judgement, cannot but remain silent on what may account for the epistemological difference between two equally spontaneous judgements (see also Annis 1980: 325-326).

Despite its initial attraction, then, an appeal to memory impressions fails to uncover necessary or sufficient conditions for the justification of propositional memory judgements.<sup>2</sup> Of course, MIT's dismissal does not signal the end of the Present Tense Theory, which comes in many different flavours. But if not memory impressions, then what sort of reason must we have at the time we remember in order for our propositional memory judgements to be justified?

## 2.2 *Virtual inferences*

The second approach to propositional memory judgements suggests we answer this question by mentioning our capacity to back up these judgements by appealing to the evidence at our disposal. And it is definitively true that we are often able to back up these judgements in this way. To illustrate, let me come back to John. John, we may suppose, does not only remember that Dreyfus was innocent, but also that he just heard a serious historian telling so, and that he saw a BBC documentary arguing for this claim. This being the case, he is in a position to argue that the evidence at his disposal is best explained by the truth of his judgement. We can imagine him as arguing along the following lines: if Dreyfus had been guilty, then serious historians and BBC documentary makers would surely not be mistaken about it.

These observations may now be used to build an alternative epistemology of propositional memory judgements. Thus, Peacocke suggests that:

A belief held without reasons is knowledge only if a sound, and in the circumstances knowledge-yielding, inference to the best explanation *could* be made from the evidence available to the believer to the truth of his belief. (1986: 163-164)

Let me adapt this claim so as to make it apply to propositional memory judgements: the idea then becomes that these judgements are justified if a *justified* inference to the best explanation is at the believer's disposal. This inference being

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<sup>2</sup> Senor (1993) and Owens (1999) offer further criticisms of MIT.

at the subject's disposal at the time he remembers, this explains why this *Virtual Inference Theory* (VIT) is, like the Memory Impression Theory, an instance of the Present Reason Theory.

In the light of the above observations about memory impressions, this approach has a lot to be said in its favour. Let me simply emphasize two important points. First, our attention is now drawn away from phenomenological issues and to the evidence at the subject's disposal, something which appears to carry more epistemological weight. Second, the spontaneous character of many propositional memory judgements is easily accounted for: VIT appeals to what is at the subject's disposal and does not require that he actually goes through a sophisticated inference.

Yet, this last observation already contains the germ of a first difficulty faced by this approach. It is customary to distinguish between justifiable and justified judgements, i.e. between judgements we merely have reasons to make and judgements we make for these reasons. VIT is at pains to admit the existence of such a distinction for propositional memory judgements. Its appeal to the availability of an inference to the best explanation readily accounts for justifiable propositional memory judgements, but what about those that are in addition justified? Now, it is correct to point out that we should be ready to count among a subject's justified beliefs the obvious, though not drawn, consequences of what he justifiably believes. However, we cannot avail ourselves of this idea to extend VIT so as to account for justified memory judgements: the inferences it appeals to are complex and far from being obvious. This means that VIT must claim that propositional memory judgements are justified only if one *makes* the inference: taking a reflective stance on doxastic states and their relations is required for justification. This gives rise to two difficulties.

First, the capacities that taking such a reflective stance presuppose have been quite consistently shown to be fully in place only around the age of 5 (e.g. Perner & Ruffman 1995). VIT thus unappealingly implies that no justified propositional memory judgement is possible before this age. The second difficulty has to do with the fact that we rarely indulge in the sort of inference around which this

approach is built. Our reliance on memory is not shot through with inferences of this nature, which are made, or so it seems to me, almost exclusively when we nourish doubts about our beliefs. And it is not only questionable to try to build, for no obvious reason, the epistemology of propositional memory on psychological assumptions that are so rarely satisfied, one also cannot in this way account for all those judgements we intuitively assess as justified despite their being obviously not based on inferences.

Let me finally focus on another problem faced by the approach under discussion, a problem which centres on those quite common cases of propositional memory in which one has lost track of one's unique evidence for the relevant judgement. In these cases, there is not much by way of available inference. Suppose for instance that John once read that Dreyfus was innocent in a serious book and completely forgot this. Which inference can he then perform? To put it a bit oddly, the only evidence at his disposal is constituted by his belief. And even if we may try to apply VIT by suggesting that John's judging that his belief is best explained by its truth qualifies as an inference of the relevant type, this appears to be a constitutive feature of firmly held beliefs. This means that John is, according to VIT, on a par as regards justification with Mark, who I shall suppose acquired the same belief for fanciful reasons. But, surely, John differs from Mark with respect to justification. VIT is, we now realize, similar to MIT as regards the way it distorts our intuitive grasp of the domain. And it distorts it for the same reason, namely because it exclusively focuses on what happens at the time John and Mark make their respective memory judgements, a time at which nothing tell them apart.<sup>3</sup>

All in all, then, the Virtual Inference Theory does not prove more convincing than an appeal to memory impressions. At this stage, it seems to me that there is but one interesting option left for trying to account for propositional memory judgements within the boundaries fixed by the Present Reason Theory.

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<sup>3</sup> Note in passing that VIT also appears to imply that forgetting a bad source of information while preserving a belief enhances its justification.

### 2.3 *Source-monitoring*

The key thought behind this third approach is constituted by the observation that, when we make propositional memory judgements, we are often able to back up our claims by reference to a source of information. John may for instance judge that he learnt that Dreyfus was innocent by reading a serious book: from his perspective, this is why he is now in a position to judge that Dreyfus was innocent. The distinctive claim of the *Source-Monitoring Theory* (SMT) is that propositional memory judgements are justified by further judgements of this nature. This is a third instance of the Present Reason Theory, because these source-monitoring judgements happen when memory judgements are passed. Yet, it differs from the Memory Impression Theory insofar as it does not rely on memory impressions, and from the Virtual Inference Theory because no reference is made to complex inferences. It is nevertheless at least as problematic as these other forms of the Present Reason Theory.

The first problem is that SMT is, as VIT, cognitively quite demanding, since justification depends on the deployment of source-monitoring capacities. For that reason, it does not allow us to draw a distinction between justified and unjustified propositional memory judgements for unsophisticated subjects. Insofar as we think that such a distinction can and should be made, SMT is a non-starter.

The second problem also echoes one we have seen is faced by VIT. SMT relies on quite questionable psychological assumptions and as a result has some dire epistemological consequences. For note that we often do not preserve the source of our propositional memory judgements and that, when we are able to cite one, this is often rather due to reconstruction than to preservation. So, if SMT requires that the source be preserved, then it implies that many propositional memory judgements lack justification – such is the case for John’s judgement, for instance, if he did not preserve its source and even though it manifests a belief based on the reading of a serious book. As a result, a large bulk of these judgements is left in the sceptic’s hands. And SMT cannot appeal to reconstruction as such. Not only is it unclear how the latter could justify a judgement – think of all those cases in

which odd confabulations are mentioned to back up a belief –, this would also turn SMT into a form of the Virtual Inference Theory that we have already seen reasons to reject.

Finally, these last observations create what I tend to perceive as the most serious problem for SMT, namely the fact that it moves around the epistemological issue without resolving it. This is so because it remains silent on the epistemological status of source-monitoring judgements or beliefs. If a judgement about the source, such as John's judgement that he heard a reliable historian tell him that *p*, justifies the memory judgement that *p*, then this justificatory power surely traces back to its own epistemological credentials: the judgement about the source has to be justified for it to transmit justification to the judgement that *p*. And if this judgement is itself a propositional memory judgement – it has to be if it manifests preservation of information about the source rather than reconstruction –, this is exactly the problem we try to resolve and about which SMT remains silent. We need to discriminate justified from unjustified source-monitoring judgements, but SMT is not up to the task.

#### *2.4 A diagnosis*

We have seen that the Present Reason Theory is, at least in the forms that have been discussed, at pains to account for the justification of propositional memory judgements. It is now time to draw a general lesson from our discussion so far.

You will remember that the three theories presented above qualify as Present Reason Theories because they respectively appeal to memory impressions, beliefs on which an inference to the best explanation can be or is drawn and source-monitoring judgements to which the subject has access when he makes the propositional memory judgement. Whatever confers justification on memory judgements is to be found in the circumstances surrounding the making of these judgements. This core assumption may be described as a form of 'present-tense internalism', since it combines two claims. First, that what confers justification is subject to an accessibility requirement and, second, that this requirement is satisfied when the memory judgement is made.

Present-tense internalism about propositional memory is the source of many of the problems we considered. Adherence to this thesis explains why the Memory Impression Theory detaches the justification of propositional memory judgements from the reasons one *had* to judge and concentrates exclusively on present impressions. It also explains why the Virtual Inference Theory is bound to claim that, insofar as two subjects are in a given predicament with respect to the inferences they can or do *now* make, they are equally justified. Finally, it constitutes the reason why the Source Monitoring Theory cannot tell apart justified from unjustified source-monitoring judgements. In each case, an exclusive focus on what is accessible to the subject when he remembers engenders serious problems because the epistemological relevance of what *happened* goes unnoticed.

If this diagnosis is along the right tracks, then it creates in my opinion a strong case against the Present Reason Theory and in favour of the Past Reason Theory, which differs from it in directing our attention to what happened before propositional memory judgements are passed. It is to this theory that I now turn.

### *2.5 The Past Reason Theory*

The Past Reason Theory can be fruitfully approached by coming back to the function of what I have called, in section 1, propositional memory reports. We should observe that these reports do not simply attribute knowledge preservation.<sup>4</sup> They rather appear to be sensitive to a complex pattern exemplified by reasons for the relevant judgement. To pin down this pattern, let me distinguish two times of epistemic evaluation: the time *at which* one remembers and the time *from which* one remembers. Propositional memory reports seem to be correctly used when a belief has been acquired for a reason satisfying the following requirement: the reason must be apt to justify the belief at the time it was acquired as well as at the

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<sup>4</sup> As opposed to a classical analysis defended in Landesman (1962), Malcolm (1963), Munsat (1967) and Zemach (1968).

time of evaluation, i.e. the time at which the ‘remember that’ report is used.<sup>5</sup> That is:

|   | Belief | Justification | Constraint on justification   |
|---|--------|---------------|---|
| Time from which one remembers ( $t_1$ ) | Yes    | Yes           | A new reason must justify a belief.   |
| From $t_1$ to $t_e$                     | No     | No            | In the absence of defeaters, the reason acquired at $t_1$ could justify the belief. |
| Time of evaluation ( $t_e$ )            | Yes    | Yes           | The reason acquired at $t_1$ must justify the belief at $t_e$ .                     |

Let me call reasons that satisfy this pattern *past reasons*. These reasons provide the starting point we need to move away from the Present Reason Theory. Refining the diagnosis presented in the previous section, we can now observe that this theory rejects the claim that past reasons justify memory judgements at  $t_e$ . This is why they appeal to a justification-conferring feature accessible at that time. And, since we have seen plenty of reasons to reject this move, this provides a powerful argument in favour of the *Past Reason Theory* (PastRT). This theory straightforwardly translates the pattern exemplified by past reasons in epistemic currency: memory beliefs or judgements at  $t_e$  are justified by past reasons.

This constitutes a radical departure from the Present Reason Theory. The most significant aspect of PastRT is indeed constituted by the absence, at  $t_e$ , of an access requirement on past reasons that justify the judgement at that time. This arguably constitutes its central virtue, since it allows PastRT to draw epistemological distinctions that the Present Reason Theory proves unable to draw. As we have seen, it is often the case that one has at  $t_e$  past reasons for judging without these reasons being accessible at that time. When he passes his memory judgement, John may for instance be oblivious to the fact that his reason for judging that Dreyfus was innocent is that a reliable historian told him so. Since

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<sup>5</sup> Naylor defends a similar account of propositional memory reports: “B remembers that p from t iff (1) there is a set of grounds a subset of which consists of (i) only those grounds B has at both t and the present for being sure that p, and (ii) enough such grounds to make it reasonable at both t and the present for B to be sure that p, and (2) there is no time prior to t such that B has a set of original grounds dating from that time.” (Naylor 1971: 33)

we quite commonly are in a situation similar to John's, requiring that justification of propositional memory judgements depend on reasons accessible at  $t_c$  would leave many of them in the sceptic's hands. PastRT avoids this kind of scepticism in claiming that past reasons are enough.<sup>6</sup> This is what allows it, as opposed to the Present Reason Theory, to distinguish justified from unjustified judgements among those that are accompanied by the same phenomenology and by the same possibility of explanatory inference, as well as to distinguish justified from unjustified source-monitoring judgements.

Let me emphasize two further aspects of this approach. First, according to PastRT, there must be a sort of dependence between the prior acquisition of a past reason and a judgement at  $t_c$  in order for that reason to justify this judgement. John's judgement that Dreyfus was innocent is defeasibly justified at  $t_c$  only if he so judges *because* he acquired a past reason for it at  $t_1$ . His judgement would not be justified if it did depend on bad reasons he acquired in the meantime. That is, for his judgement to be justified by the past reason, the following requirement must be met: John would not judge that  $p$  if he had not been told so by a reliable historian at  $t_1$  and would judge differently if he was told something else by that historian. The justificatory role of past reasons hangs on such dependence.

Second, this means that PastRT is distinct from the claim that one should stop believing when one evaluates one's reasons as unsound, a claim known as the 'principle of positive undermining' (Harman 1986: 39). PastRT does not endorse a 'default and challenge' conception of justification (Williams 2001) with regard to propositional memory judgements: they are not justified until proven guilty. Rather, PastRT discriminates justified from unjustified judgements among those for which one has no accessible reason in terms of their dependence on past reasons. The application of the principle of positive undermining is as a result limited to judgements that satisfy this constraint: only these are justified until proven guilty.

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<sup>6</sup> PastRT is of course compatible with the idea that accessible past reasons have an epistemic impact. It only denies that this is required for justification at  $t_c$ . For one way to develop this point, see the end of section 2.6 below.

### 2.6 Developing the Past Reason Theory

In the previous section, I introduced the Past Reason Theory as a radical alternative to the Present Reason Theory. Since this approach to the justification of propositional memory judgements can be developed in various ways, I now want to spend some time to explain how I think it should be developed.

To see what is at stake here, note that PastRT can put different constraints on the two times of epistemic evaluation. Thus, according to a first development of PastRT, propositional memory judgements that  $p$  at  $t_e$  are justified only if judgements that  $p$  at  $t_1$  are themselves justified, i.e. *fully* exhibiting the pattern presented at the beginning of section 2.5 is required. An alternative development is advocated by Lackey (2005), who maintains that the judgement occurring at  $t_1$  need not be justified for the propositional memory judgement to be justified, i.e. *partially* exhibiting the pattern is enough for justification at  $t_e$ . Let me call these respectively *Full* and *Partial*.

Full: a propositional memory judgement is justified at  $t_e$  if it manifests a belief acquired at  $t_1$  for a reason in the light of which the judgement is justified *at  $t_1$  and  $t_e$* .

Partial: a propositional memory judgement is justified at  $t_e$  if it manifests a belief acquired at  $t_1$  for a reason in the light of which the judgement is justified *at  $t_e$* .

I shall now, as a first step in the direction of assessing the respective merits of Full and Partial, expand my previous example. Let us suppose that John acquires the belief that Dreyfus was innocent at  $t_1$  because Mary tells him so, but that his belief is not justified because he has bad reasons not to trust her. Let us add that, between  $t_1$  and  $t_e$ , John forgets the source of his belief and does not acquire any new reason in its favour. Finally, suppose that, at  $t_e$ , he judges that Dreyfus was innocent because he acquired the belief at  $t_1$ . Note that Full and Partial differ in how they assess John's memory judgement. According to the former, his judgement is not justified at  $t_e$ . But according to the latter, it is justified insofar as

John has forgotten his bad reasons to distrust Mary or has in the meantime come to believe she is trustworthy.<sup>7</sup>

I shall now argue that Full should be preferred. To start, note that Partial goes against the following epistemological intuition. It seems that if one judges that *p* because one has judged that *p*, then the epistemological status of the former judgement depends on that of the latter. For instance, even if the relevant defeater is later defeated, it seems that John judges *for a defeated reason* given that his judging at  $t_e$  that Dreyfus was innocent depends on having so judged at  $t_1$ , a time at which the reason was defeated. He would judge *for an undefeated reason* only if his judgement were to depend on a prior judgement made at a time when the relevant reason was not defeated. I am tempted to think that this favours Full, which differs from Partial precisely in its capacity to draw such an intuitive contrast. So, let us dig deeper to see whether this intuition is sound.

To do so, let me explain why Full assesses John's judgement as unjustified. I think that this verdict is motivated by the following observation: given his situation, John would judge that Dreyfus was innocent irrespectively of whether his reason in favour of judging so is presently defeated or not. It is for that reason that Full rejects the strong form of externalism about propositional memory that is characteristic of Partial. For note that, according to Partial, what justifies these judgements is the *reliability* of the cognitive mechanism that delivers these judgements through preservation of beliefs based on the relevant kinds of reason (Lackey 2005). It is for instance because it manifests a reliable cognitive mechanism – the memory preservation of beliefs based on what serious informers tell us – that John's judgement is now justified (if not defeated). And the fact that

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<sup>7</sup> Favouring Partial, Lackey (2005) argues that memory can for that reason be a generative epistemological source: the judgement is justified because it is a memory judgement. This would mean that judgements are justified at  $t_e$  because they manifest beliefs reliably preserved from  $t_1$  and so that preservation in itself positively contributes to justification. Yet, the fact that preservation explains why the judgement is made at  $t_e$  does not imply that it plays such a role. We should rather say that preservation allows past reasons to (potentially) justify the judgement at  $t_e$  by making it the case that this judgement depends on a belief acquired because of the past reason. For judgements are not justified simply because they manifest a preserved belief; they rather inherit their justification from the past reasons. So, even though Partial were correct, this would not support the claim that memory is a generative epistemological source.

Partial adopts this form of reliabilism about propositional memory will now allow us to build what I perceive as a strong argument against this approach.

To see how, note that reliabilism faces the task of specifying *psychologically realistic* and *reliable* cognitive mechanisms. So, which cognitive mechanism is at play in John's case? I think there are two possible answers to this question. One may attempt to specify the mechanism either as that consisting in (a) preserving unjustified beliefs when what defeated the reasons one had for them is itself defeated, or as that consisting in (b) preserving unjustified beliefs if one has no reason against them. And this creates a dilemma.

On the one hand, (a) is surely a reliable mechanism, but it is psychologically unrealistic. To be realistic, it would have to require that one has access to the relevant reasons in order to be in a position to discriminate actually defeated from actually undefeated reasons. Now, to add such a requirement in a defence of PastRT would offset one of its main advantages over the Present Reason Theory, since this would after all hand in to the sceptic that large bulk of propositional memory judgements for which no such discrimination is possible. Yet, in the absence of such a requirement, it is fair to say that one would still judge even if the reason were in fact defeated. The mechanism being for that reason unreliable, the judgements it gives rise to are, by the reliabilists' own lights, unjustified.

I think that we should reach the same verdict regarding (b), the mechanism consisting in preserving unjustified beliefs insofar as one has no reason against them. This mechanism is clearly psychologically realistic, but is of no avail to epistemologists of a reliabilist bent. After all, preserving beliefs that were not justified in the light of the reasons we had but which are actually not defeated is surely not a reliable mechanism of belief preservation.<sup>8</sup>

The fact that this dilemma does not affect Full suggests that this way of developing PastRT is preferable. And we are now in a position to realize that

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<sup>8</sup> Memory is often said to be epistemologically similar to testimony (e.g. Burge 1997). If so, then my argument has the following implication. The fact that one would not share the witness' reasons against his claim is not enough for justification. What is required is that one actually realizes that the witness' defeaters are themselves defeated. Justification transfer is sometimes blocked by irrationality (or malice) and to get rid of it requires access to an undefeated reason.

Partial faces this dilemma because it dispenses, contrary to Full, with a specific internalist constraint on justification. Let me explain. According to Full, the fact that a memory judgement made at  $t_e$  depends on an unjustified past judgement for which one had a reason that, given how the situation has changed, could justify it is not sufficient for that judgement to be justified. Rather, the past judgement should also have been justified in the light of the reason: the justification of memory judgements requires that one has, at a time, *access* to a reason in the light of which the judgement is justified. Against this, Partial admits that these judgements can be justified even if no such time ever occurs, like when the reason is accessible but defeated at  $t_1$  and undefeated but inaccessible at  $t_e$ .

This disagreement stems from the different ways Full and Partial conceive the *basing relation* for memory judgements and its connections with the subject's epistemic responsibility and rationality. Full claims that this relation has two parts: (a) the subject must have judged because he had access to a reason in the light of which his judgement was justified, and (b) his memory judgement must depend on his having made the past judgement in this way. Thanks to (a), considerations of epistemic responsibility and rationality at the time from which one remembers have a bearing on subsequent justification. By contrast, Partial turns (a) into: (a') the subject must have judged because he had access to a reason in the light of which his judgement would now be justified ((b) is modified accordingly). For that reason, it allocates no role to epistemic responsibility and rationality in the justification of memory judgements: these judgements can be justified despite the fact that one never judges because one has access to reasons in the light of which they are justified.

Keeping the above dilemma in mind, we can conclude that the basing relation for memory judgements must be as Full conceives it to be so as to avoid a form of epistemic luck. For a memory judgement to be justified, it must depend on a reason that justifies it. This is the case if it depends on one's having made it at  $t_1$  in the light of an undefeated reason, but not if it depends on one's having made it at  $t_1$  in the light of a defeated reason. For in the latter case, as I already

observed, one would still make the judgement if the reason was still defeated. This form of epistemic luck is, I think, detrimental to justification.

Let me bring this discussion to a close with a few words regarding how we should develop Full. In my opinion, we should use the requirement that memory judgements must be based, at a time, on accessible reasons apt to justify them so as to distinguish several cases of propositional memory. In the most straightforward cases, this requirement is satisfied at the time the belief is formed. In more complex cases, it is not because the reason is at that time defeated. I suggest that, in these cases, subsequent justification requires that the reason be preserved so that one is able, at a later time, to base one's judgement on it. If John's reason to believe that Dreyfus was innocent is that Mary told him so at  $t_1$ , a time at which he did not trust her, then he must remember that she told him that Dreyfus was innocent at  $t_2$ , a time at which he trusts her, in order for his judgement to be justified by that reason from that time.<sup>9</sup> Developed along these lines, I think that the Past Reason Theory constitutes an appealing account of justified propositional memory judgements.

### 3. EPISODIC MEMORY

The first part of my argument consisted in explaining why the Past Reason Theory provides a more appealing epistemology for propositional memory than the Present Reason Theory. Does this mean that we should extend this theory so as to cover episodic memory as well? The second part of my argument will consist in explaining why this is not the case. As we shall see, when we turn our attention to episodic memory, the Present Reason Theory becomes almost irresistible.

#### *3.1 The specificity of episodic memory*

We have seen in section 1 that episodic memory is about specific events in one's past life, and that there exist various attempts to distinguish it from propositional memory. As I said there, my aim here is not to assess these theses about episodic

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<sup>9</sup> This means that the Source-Monitoring Theory (see section 2.3) is true in these more complex cases. The mistake is to extend it to all cases of propositional memory.

memory. Yet, the following observations prove important in the context of the present discussion.

First, and as already emphasized, some influent approaches to episodic memory claim that it differs from propositional memory simply in virtue of having a distinct subject matter. As a result, they block in my opinion the possibility of developing an epistemology specific to episodic memory. Second, these approaches to episodic memory are not sufficiently sensitive to the existence of a distinctive intentional relation to past events in our life, an intentional relation that is quite unlike what happens in propositional memory. Remembering in this way events in one's own past is, as opposed to merely remembering that these events happened, to stand in a phenomenologically rich intentional relation to these events. It is this form of remembering that tempted so many philosophers to try to understand memory in terms of memory images or, more neutrally, of memory experiences.

My interest will be in this distinctive way of remembering. I happen to think that we should draw the distinction between propositional and episodic memory by means of that which constitutes one's remembering and so account for the specificity of episodic memory in terms of these memory experiences.<sup>10</sup> But if you disagree, you can regard what follows as an argument for drawing a distinction between two sorts of memory in virtue of their different epistemological structures. For, independently of the verbal quarrel about what deserves to be described as episodic memory, the epistemological distinction on which I shall focus is sufficiently important to play a central role in a taxonomy of mnesic phenomena.

This being said, let me now try to answer the following two questions. First, what are these experiences that constitute this distinctive kind of memory? Second, which epistemological role do these experiences play?

As regards the first question, one striking fact about memory experiences is that they bear a systematic and probably irreducible similarity to perceptual

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<sup>10</sup> Hoerl (2001) and Martin (2001) rightly emphasize the central role of experiences in episodic memory.

experiences. Consider the following examples. Remembering a melody one once heard is phenomenologically similar to hearing it, remembering an accident phenomenologically close to seeing it, remembering the taste of a wine phenomenologically close to tasting it. These memory *experiences*, it should be emphasized, are quite unlike the memory *impressions* discussed above in connection with propositional memory. Appeal to memory impressions is, as we have seen, part of an attempt to describe the distinctive phenomenology of propositional memory, of the act of remembering that p and this independently of its specific content. The memory experiences we are now discussing do not exhibit this content-independence. An experience similar to seeing a particular accident is constitutive of episodically remembering that specific accident and different memory experience, also exhibiting this similarity with the relevant past perceptions, are constitutive of the episodic memory of a melody or of a taste. For the purposes of the present discussion, it is enough to add that these experiences re-present items that previous experiences presented and thus inherit at least part of their intentionality from the intentionality of these previous experiences.

Let me now turn to the second question regarding the epistemological role of these experiences. When we remember by means of these experiences, we unquestionably rely on them in making past-tensed judgements and consider them as justifying us in so judging. To drive this point home, note that there is an important difference between cases where one propositionally remembers that an event occurred and cases where one has a memory experience of the event. In the second case, one can refer to one's memory experience in order to back up one's judgement, which is the case when one answers a question as to why one thinks that the event happened by saying 'because I (distinctively) remember it'.

These observations seem to me to fix a fundamental constraint regarding the epistemological role of memory experiences. Any theory that tries to dispense with these experiences is deeply revisionist about our practice of making past-tensed judgements in episodic memory. But what should we more positively say about the epistemological role played by these experiences? A straightforward answer consists in claiming that these judgements are justified if based on these

experiences. And an appealing way of developing this answer consists in accepting something like the following principle:

If a mnesically appears F to S, then S is prima facie justified in judging that there was an a which was F if s/he bases her/his judgement on this experience.<sup>11</sup>

This principle claims that when Jim episodically remembers an accident and judges that it was F, what justifies his judgement is the fact it is based on his memory experience of this accident. A principle of this nature seems to be needed insofar as we want to respect the intuitive role played by memory experiences in the justification of past-tensed judgements. And, since we obviously cannot extend such a principle to propositional memory, this supports the idea that there is a fundamental epistemological difference between episodic and propositional memory judgements. Let me elaborate on this point.

The above principle qualifies as a *Present Reason Theory*: since the memory experiences that justify episodic memory judgements occur at the time these judgements are passed, it subscribes to what I called in section 2.4 present-tense internalism. This means that the epistemology of episodic memory judgements is, according to this principle, quite similar to that of perceptual judgements: in both cases, the judgements are justified because they are based on experiences with a specific content.

Before I consider some reasons not to endorse this principle, let me end this discussion by stressing four of its features. First, its antecedent does not distinguish veridical memory experiences from memory illusions or hallucinations. I tend to perceive this as a virtue because I think that, sometimes at least, illusory or hallucinatory experiences justify past-tensed judgements. This is the case when what appears to one as a memory experience is in fact an indistinguishable mnesic hallucination. But if you side with some recent developments of disjunctivism in this respect, you can easily modify the principle accordingly. Second, the antecedent does not refer to judgements about experiences but about the world, for the often-stressed reason that making

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<sup>11</sup> Chisholm (1989: chap. 5) defends a closely related principle.

judgements about features of our experiences is not the norm (e.g. Pollock & Cruz 1999: 25). In this sense at least, mnemonic experiences are transparent. Third, the consequent states that if the antecedent is satisfied, then judgements are justified insofar as (a) they are formed because of the relevant memory experience and (b) they attribute to the remembered object a property this experience re-presents it as having. Both requirements are needed to distinguish judgements based on experiences from judgements that merely co-occur with them. Fourth and finally, judgements based on memory experiences are according to this principle *prima facie* justified, i.e. justified provided no defeater is present.

### 3.2 *Some challenges*

Despite the fact that the Present Reason Theory in the form of the above principle offers an intuitively appealing epistemology of episodic memory judgements, the truth is that it faces serious challenges. In this section, I shall enquire as to whether this principle can take them up.

Audi nicely expresses the first challenge on which I want to focus in suggesting that the Present Reason Theory is wrong-headed because we should not

try to find a rich phenomenal ground for every justified memory belief. That effort should be seen as very likely to be motivated by a futile desire to understand memorial justification on the model of perceptual justification, for which there is a basis quite distinct from the experience of taking in or even carefully considering the proposition in question. (1995: 35)<sup>12</sup>

We are in a position to agree with a first reading of Audi's remark, though not with a second. If Audi's aim is to criticize the attempt to model the epistemology of propositional memory on that of perception, this is unquestionably correct: we have seen that memory impressions are quite elusive and at any rate not sufficient to justify these judgements. However, as is revealed by the context surrounding the above passage, this is not what Audi has in mind. His claim is rather that it is futile to try to find *rich* (memory experiences) as opposed to *poor* (memory impressions) phenomenal grounds for the justification of memory judgements.

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<sup>12</sup> A similar objection is made in Naylor (1985) and Senor (1993: 456-459).

And our conclusions should lead us to view this as an unsatisfying starting point for an epistemology of memory. What is fruitless is not the appeal to rich phenomenal grounds in connection with episodic memory judgements, but rather the appeal to poor phenomenal grounds in connection with propositional memory judgements. After all, in the light of the way memory experiences contribute to the making of past-tensed judgements, we would misdiagnose the attempt at building the epistemology of episodic memory judgements on rich phenomenal grounds if we were to view it as revealing a futile desire to model the epistemology of memory on that of perception. Yet, can we explain why as seasoned an epistemologist as Audi misdiagnoses the situation in such a way? I believe the explanation is to be found in the assumption that the epistemology of memory is unified. This assumption explains why one may be led to think that, since rich phenomenal grounds cannot be appealed to in connection with propositional memory, poor phenomenal grounds justify all memory judgements. This is precisely the assumption I want to reject and to which I shall come back in the final section. But, except for this assumption, Audi gives no reason to think that the epistemology of episodic memory is not similar to that of perception.

The second and third challenges which I want to discuss centre around issues having to do with the epistemological dependence of memory. One might first wonder, and this constitutes the second challenge, if the claim that the epistemology of episodic memory judgements is similar to that of perceptual judgements is not doomed from the start since, unlike what happens in perception, one already knows what one remembers (Landesman 1962). Now, if this amounts to claiming that the judgements we make when episodically remembering have all already been made at the time the past experience occurred, it would not constitute a good reason to reject the principle. There are after all original episodic memory judgements, judgements one passes for the first time when one episodically remembers (Martin 1992). More charitably, we may read the challenge as claiming that memory should not be conceived as an independent, quasi-perceptual access to the past. Such a conception of memory does not subtend the principle, however. The similarity with perception is claimed to lie in

the fact that different kinds of experiences play the same epistemological role in perception and in episodic memory, which does not imply that episodic memory constitutes an independent access to the past.

Still, one might nourish doubts about the principle's adequacy for a slightly different reason that constitutes the third and final challenge. For, even if the principle does not rest on the claim that memory is an independent access to the past, does it not go against the epistemic dependence of memory? Naylor nicely expresses this challenge in the following passage:

That memory impressions cannot now give me knowledge unless one has had an original justification of a sort that could (if one had it now) now give one knowledge, is a principle whose denial would mean that our memories could sometimes be a source of knowledge in an unwelcome way. (1982: 435, see also Annis 1980)

Remember that we already encountered this problem in connection with propositional memory. I argued there that we should not, as opposed to the Present Reason Theory, divorce the justification of propositional memory judgements from past reasons. Does the principle commit the same mistake in failing to respect the epistemic dependence of episodic memory judgements?

It is true that some of the judgements the principle counts as justified could not have been justified in the past. This is the case for judgements based on hallucinatory memory experiences. I suggested above that some of these past-tensed judgements may be justified, and this despite the fact that there are, obviously, no past situations in which the corresponding present-tensed judgement could have been justified. With regard to these judgements, the principle indeed endorses a sort of epistemic independence, which appears to be required if one thinks that memory hallucinations can justify. But one may alternatively consider this as an argument in favour of restricting the principle to veridical memory experiences. Whatever one's verdict in this respect, I think that the admission of this sort of epistemic independence is compatible with the claim that memory is epistemologically dependent. For, according to the principle, epistemic independence takes place only when, unbeknownst to one, one is not enjoying a memory experience. This is to say that epistemic dependence is secured insofar as

one is ready to conceive of memory experiences as experiences that re-present what the past experiences on which they depend presented. To justifiably judge on the basis of a memory experience that the accident was F implies that the judgement that it is F was at least *prima facie* justified at the time of perception. And this, we may further observe, constitutes an epistemologically significant difference with memory impressions. Appealing to the latter, I argued, implies that the justification of memory judgements is independent of one's past reasons in their favour. By contrast, memory experiences depend on "an original justification of a sort that could (if one had it now), now give one knowledge." They re-present this original justification and, in a sense, do not provide a new one.

#### 4. RESOLVING THE DEBATE

Let me conclude. In section 2, we have seen that a specific kind of Past Reason Theory is best suited to deal with the justification of propositional memory judgements. These judgements are justified by past reasons, and this independently of whether these reasons are accessible at the time we remember. In section 3, I argued in favour of the Present Reason Theory about episodic memory judgements: these judgements are justified by memory experiences that take place at the time of remembering.

This motivates the following resolution of the debate between the Past Reason and the Present Reason Theories. This debate is the result of a mistaken attempt at extending one of these theories to account for the justification of a kind of memory judgement for which it is not suited. On the one hand, the Present Reason Theory is correct for episodic memory, but extending it to propositional memory judgements leads to the claim that these judgements are justified by what happens at the time we remember, for instance by memory impressions. And this creates some serious difficulties. First, not only are memory impressions often quite elusive, but they are also in serious tension with the epistemic dependence of memory and insufficient to account for the justification of propositional memory judgements. Second, attempting in this way to unify the justification of

propositional and episodic memory judgements typically leads one to favour memory impressions over memory experiences, an unappealing move in the light of the rich phenomenology of episodic memory. On the other hand, the Past Reason Theory is correct for propositional memory, but extending it to episodic memory runs afoul of the ways we usually justify episodic memory judgements by downplaying the epistemological role of memory experiences.

Since these problems all derive from the attempt at providing a unified theory regarding the justification of memory judgements, my conclusion is that no such unity is to be found.<sup>13</sup>

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<sup>13</sup> My conclusion has some affinities with Burge's distinction between substantive and purely preservative memory (1993, 1997).

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