

Why Sufficiencyarianism is not Indifferent to Taxation



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Abstract

The indifference objection is one of the most powerful objections to sufficientarianism. Critics argue that sufficientarianism is objectionably indifferent to the distribution of benefits and burdens. This article focuses on the criticism of the latter, particularly the claim that sufficientarianism is indifferent to taxation. Contrary to this allegation, it is argued that sufficientarianism warrants progressive taxation, the reason being that even those who are sufficiently well off face the risk of being pushed below sufficiency. This risk decreases the better off someone is as it is easier for those who are better off to deal with sufficiency-threatening circumstances. It is argued that the risk of insufficiency understood as a function of distance to the threshold justifies progressive taxation. The proposed line of reasoning corresponds to the sufficientarian belief that there should be no redistribution between the rich, as the differences in risk of insufficiency eventually become marginal among those who are very well off. Moreover, the proposed rationale for progressive taxation does not depend on prioritarian or egalitarian reasoning. Rather, it transpires that sufficientarianism is well-suited to justify the progressive redistributive system of the modern welfare state.

Keywords: *sufficientarianism, distributive justice, indifference objection, ethics of taxation*

The doctrine of sufficientarianism has recently gained some momentum in distributive justice as a rival to prioritarianism and egalitarianism. However, the indifference objection arguably remains one of the most powerful objections to the doctrine. It alleges that sufficientarianism is objectionably indifferent to distributions of benefits and burdens once everyone has secured enough. Specifically, critics maintain that sufficientarians are indifferent between progressive and regressive tax systems. Such indifference runs counter to intuitions toward a progressive tax

system—and even critics of such a system would reject sufficientarian indifference.

In this article, I present a sufficientarian account in favor of progressive taxation. In a nutshell, I argue that even those who lie above the sufficiency threshold(s) face a risk of insufficiency due to changing life circumstances. The risk of insufficiency should *ceteris paribus* be understood as a function of distance to the sufficiency threshold: it decreases the better off someone is. This effect eventually subsides, as the differences in risk between the rich and the super-rich become insignificant. Hence, this line of reasoning justifies progressive taxation while maintaining the core sufficientarian intuition that it is absurd to demand redistribution between the rich.

This argument relates to all types of burdens that are distributed within a society, although this article primarily focuses on the burden of taxation. If my argument succeeds, it rebuts one of the main objections to sufficientarianism and marks a step toward establishing sufficientarianism as a suitable theory of justice to validate the modern welfare state which taxes progressively. Furthermore, unlike a number of alternative sufficientarian responses to the indifference objection, the argument presented here is distinctively sufficientarian, i.e. it does not build on any egalitarian or prioritarian reasoning. The purpose of this paper is not to justify progressive taxation in general; consequently, I do not attempt to provide a general discussion of taxation here. Rather, I examine whether sufficientarianism can justify a progressive tax regime.

The article is arranged as follows. The first section distinguishes between three types of indifference objections to sufficientarianism and explains why indifference against burdens appears to be the most powerful objection. Section 2 demonstrates that current sufficientarian accounts of the distribution of burdens fail to provide a convincing and distinctively sufficientarian line of reasoning. In Section 3, the main argument of article, i.e. the claim that the risk of insufficiency validates progressive taxation, is elaborated. Four objections to this approach are discussed and rebutted in Section 4. Section 5 concludes.

1 The indifference objection to sufficientarianism

Sufficientarianism was introduced into the theory of distributive justice by Harry Frankfurt in the 1980s and has emerged as a serious rival to prevailing theories such as egalitarianism and prioritarianism. Most sufficientarians agree with Frankfurt that sufficientarianism is fundamen-

tally anti-egalitarian in rejecting equality as a distributive ideal.¹ What matters instead is for everyone to secure enough.

Sufficientarianism typically entails a positive and a negative thesis.² The positive thesis states that there are weighty reasons to secure at least enough of some good(s) for everyone. A specific threshold determines the level of sufficiency.³ The negative thesis, on the other hand, asserts that redistributive activity ends once everyone surpasses the threshold. In that case, no further issues of justice arise. This implies that those that lie above the threshold have no entitlements to benefit from redistributions.

The negative thesis specifically has sparked much controversy. The indifference objection is arguably one of the most powerful objections in this context.⁴ Liam Shields generalizes it as follows:⁵

Sufficiency principles are implausible because they are objectionably indifferent to inequality once everyone has secured enough.

However, spelling out the indifference objection in terms of inequality is on the one hand too broad, and on the other, too narrow. It is too broad because it does not specify which inequalities in particular are problematic. Indifference may not be problematic with regard to *all* inequalities—but which ones are problematic? Furthermore, it is too narrow as plausible indifference objections could also be formulated without any reference to inequality (e.g. objectionable indifference to the priority of the worst off). Here, I outline the objection in terms of three basic elements that can be inserted in the above formulation in place of inequality: distribution of benefits, distribution of burdens or other values aside from these two.

With reference to benefits, the negative thesis maintains that we should be indifferent to their distribution if everyone is sufficiently well off, e.g. in a Beverly Hills-like community or with the redistribution of benefits among the super-rich.⁶ However, some arguments have been brought forward against this intuition. Paula Casal, for instance, discusses the case of a hospital that provides sufficient care to all patients in all relevant respects.⁷ Then, the hospital receives a major donation including spare rooms for visitors, gourmet meals and a world-class cinema. Critics of sufficientarianism argue that it would be unfair if the hospital's administration offered all these luxuries to a few arbitrarily selected beneficiaries. In this case, issues of justice continue to arise even though everyone has enough.

The second type of objection relates to the distribution of burdens. One example of this type of objection follows:⁸

Imagine that there are only supercontented millionaires and much poorer persons who are content in our society. Even assuming that the tax burden will not push members of either group below the contented threshold, it seems that we should not be indifferent about who should bear the greater costs in this situation. The super-contented billionaires should bear the costs and indifference is implausible in such cases.

Sufficientarians might argue that those below the threshold should generally be burdened less heavily (if at all) than more affluent members of society. However, the indifference objection presented in Shields' example suggests that sufficientarianism has no theoretical resources to prefer one burdening scheme over another when it comes to those who have enough. Such indifference, however, seems counterintuitive.

Finally, the indifference objection can refer to other values aside from benefits and burdens. For instance, even if an individual is sufficiently well off in all relevant aspects and is perfectly content, it would be unfair to discriminate against her based on her religion or race.⁹ Sufficientarianism would thus be objectionably indifferent to discrimination against those that lie above the threshold. The broad and generalist formulation of the negative thesis opens the door for a number of other indifference objections aside from benefits and burdens. Similar arguments could be construed for other *x*'s, such as theft, disenfranchisement or violations against human dignity.

In this article, I focus on the second type of objection, i.e. the claim that sufficientarianism is objectionably indifferent to the distribution of burdens once everyone has secured enough. The claim that sufficientarianism is indifferent to taxation burdens is particularly powerful, given that taxation is a key component of distributive justice and is often subject to intense public debate.¹⁰ It would be odd if sufficientarians held that there is little to be debated from a justice perspective when it comes to taxation. That, for instance, would imply that sufficientarians are indifferent to whether those who have enough are taxed progressively or regressively. Yet, progressive taxation is a widely accepted tenet of the modern welfare state—and even libertarian critics who favor a radically different taxation system would not agree with sufficientarian indifference.

Moreover, it is questionable whether the other two types of objection contest sufficientarianism as compellingly as the second type, at least

as formulated above. The reason for this is that sufficientarianism is a theory of distributive justice, not one of justice *tout court*—and hence should be discussed accordingly. Distributive justice has often been characterized in terms of the distribution of benefits and burdens among the members of society.¹¹ Consequently, for values aside from benefits and burdens, it is unclear whether they relate to distributive justice at all. For example, it seems strange to argue that discrimination is a burden that should be distributed fairly within a society. In other words, any x beyond distributive concerns does not challenge sufficientarianism as a theory of distributive justice.

The benefits objection also does not necessarily relate to sufficientarianism as a theory of distributive justice. Drawing on Rawls, distributive justice can be contrasted with allocative justice.¹² While distributive justice is concerned with the production and distribution of goods, allocative justice deals with the question of how a given good is to be distributed among given individuals, irrespective of any cooperative relations between the individuals involved in the production of these goods. Indifference to benefits as in the hospital example above would be a question of allocative justice. It is unclear whether sufficientarianism applies to allocative justice.¹³ The objection as put forward in the hospital example might then miss the target.

Before moving on, let me stress that my intention is not to claim that these two aspects of distributive justice, i.e. indifference to benefits and to burdens, are analytically separate. Nagel and Murphy correctly point out that one cannot assess the justness of burdening in isolation, but that such an assessment must always take the overall scheme of benefits and burdens into account.¹⁴ Yet, there are two reasons for making this distinction here, one being pragmatic and the other conceptual.

First, I classify indifference objections into benefits, burdens and other values because these reflect the prevalent indifference objections found in the literature. What is labeled as “indifference objection” in the literature actually covers a number of very different objections; hence, a classification is inevitable. I do not contend that other indifference objections (in particular those related to benefits) are not worthwhile discussing. Take, for instance, the following objection by Paula Casal:¹⁵

Even when everyone has enough, it still seems deeply unfair that merely in virtue of being born into a wealthy family some should have at their disposal all sorts of advantages, contacts, and opportunities, while others inherit little more than a name.

This is clearly not a case of allocative justice, but relates to distributive justice. It would be beyond the scope of this article to address such cases in detail here. Nevertheless, we shall see that the argument presented here provides sufficientarianism with promising theoretical resources to deal with such cases as well.

Secondly, and more importantly, while the moral assessment of a distribution of burdens is not analytically independent from that of the distribution of benefits, it nonetheless poses some independent questions. As Henry Shue puts it, benefits and burdens relate to two different core questions in distributive justice: the former addresses “to whom” goods are to be distributed while the latter investigates “from whom” these goods are to be taken.¹⁶ We may know to whom and to what extent we want to distribute benefits—but that does not mean that we know who should carry the burden. There is also no clear-cut answer when we pose the question the other way around: by deciding whom to tax and to what extent, we do not know who the benefits should be distributed to. It thus makes sense to make the distribution of burdens a topic in its own right.¹⁷

2 *The indifference objection toward burdens*

Sufficientarianism’s main rivals, prioritarianism and egalitarianism, can justify progressive taxation. For instance, leveling inequalities of whatever type can be achieved in two ways: either by benefitting the worst off or by burdening the better off. That is, egalitarian concern for the worst-off and progressive taxation are two sides of the same coin. The link between benefitting the worst off and progressive burdening comes just as natural to prioritarianism. The priority view knows no stop-gate, i.e. it advocates benefitting the worse off rather than the better off and burdening the better off more than the worse off. Hence, both prioritarianism and egalitarianism are in favor of progressive taxation.

As already discussed in the last section, sufficientarianism appears to be objectionably indifferent to the distribution of burdens. With reference to benefits, sufficientarians believe that the objective of redistribution should be raising the quality of life of those who are worst off to a level of sufficiency. This begs the question who should be burdened to what extent. The sufficientarian view on benefits appears to have no entailments whatsoever about how those who lie above the threshold should be burdened, let alone whether this should be done progressively. What is certain, however, is that burdens for those who lie beneath the

threshold should be avoided.

Little has been said to defend sufficientarianism against this objection. A notable exception is Robert Huseby's argument to justify a sufficientarian preference for progressive over regressive taxation.¹⁸ Huseby asserts that the highest sufficiency threshold is relative to the overall welfare in society. The reason for this is that the welfare of others has a real psychological impact on individual contentedness beyond envious reactions. In other words, relative deprivation in part determines the sufficiency threshold. Now, if there is an improvement in the welfare of the relatively well off, the sufficiency threshold increases for all. In such cases, more inequality leads to more insufficiency if the welfare of those who lie only slightly above the threshold does not increase. Consequently, inequality-increasing distributions of burdens (e.g. regressive taxation) work counter to the goal of sufficiency, even though the inequalities as such are supposedly not problematic.

It seems plausible that the level of welfare of those around us affects our assessment of the adequacy of our own level of welfare. But Huseby's argument is fraught with a number of difficulties. It is unclear how a distinction between normatively relevant and irrelevant psychological reactions (with envy as an example for the latter) can be justified. It is difficult to define a generally acceptable level of psychological reaction, given that some people rarely compare themselves to others while others do so frequently. Therefore, psychology seems to be a questionable and ambiguous means to define thresholds.

Moreover, the relationship between equality and sufficiency is unclear, and to some extent problematic. The relationship between these two concepts can either be understood empirically or conceptually. An empirical relationship between inequality and insufficiency means that, under certain circumstances, inequalities and insufficiency come hand in hand. Beyond references to psychological reactions, Huseby says little about the circumstances and causes of this relationship—hence, a more thorough investigation is needed here.

Such an investigation, however, may unearth a *conceptual* link between sufficiency and equality. This means that regardless of circumstances, inequality leads to insufficiency and consequently, inequality must be avoided by means such as progressive taxation. However, a conceptual relationship between equality and sufficiency seems dubious given that sufficiency was introduced as a rival to egalitarianism.¹⁹ Beyond that, reducing sufficiency to equality would make sufficientarianism a potential target to Occam's razor. In any case, it seems that propo-

nents of progressive taxation have good reasons to stick to egalitarianism as the more clear-cut approach to justifying their position.

Another sufficientarian response to the indifference objection toward burdens takes recourse to a reference to prioritarianism and to diffusing the negative thesis. In the past, the underlying objective of sufficientarianism was sometimes understood as maximizing the number of people who live in sufficiency (headcount sufficientarianism).²⁰ Yet, maximizing headcount sufficiency does not lead to a progressive system, not even for those who lie below the threshold. The reason is that it may require benefitting those who are slightly below the threshold by smaller amounts (to raise them above the threshold) rather than benefitting the even less well off by larger amounts (which do not raise them above the threshold). This may be plausible in triage scenarios but not as a general doctrine of justice to guide the distribution of benefits and burdens within a society. Hence, many sufficientarians now reject headcount sufficiency and subscribe to prioritarianism below the threshold(s).²¹ This implies progressive burdening below the threshold: the farther someone lies below the threshold, the less he or she should be burdened in general.

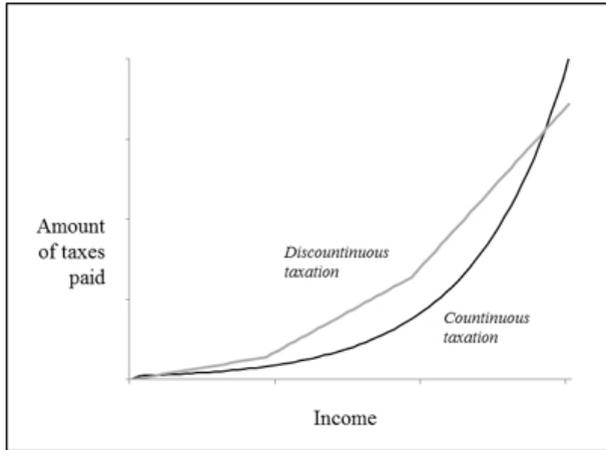
Yet what about those who are above the threshold? Sufficientarians could diffuse the negative thesis and repudiate that there are any further relevant considerations of justice once everyone has enough. Liam Shields, for instance, argues that there is a discontinuity in the marginal weight of someone's demands of justice once a person moves beyond a given threshold.²² That is to say, sufficiency thresholds mark a shift in the nature of our reasons to provide for further benefits for people—but not necessarily as a cut-off point for distributive demands. A person who lies above the threshold may still have entitlements to justice in terms of both burdens and benefits alike.

To spell out what that might imply, Shields discusses the possibility of understanding sufficientarianism as non-uniform prioritarianism (or vice versa), which basically extends prioritarianism to those who lie above the threshold.²³ What distinguishes non-uniform from uniform types of prioritarianism is the discontinuity at the level of threshold(s).

To illustrate the implication this has for taxation, consider the below chart. In a discontinuous taxation system, there are certain points at which the tax rate changes—as advocated by non-uniform prioritarianism. By contrast, uniform prioritarianism calls for a gradually increasing tax rate.

Sufficientarianism as non-uniform prioritarianism can account for progressive taxation, albeit at the cost of several disadvantages. First,

Figure 1: Continuous versus discontinuous taxation



it is very closely tied to prioritarianism, as it justifies progressive taxation all the way up based entirely on prioritarian grounds. Discontinuity remains the only distinctively sufficientarian element in this view. One may doubt that this suffices to justify sufficientarianism's status as a rival to prioritarianism and egalitarianism. Additionally, discontinuity itself is controversial. It is not at all clear whether we should prefer continuous or discontinuous tax rates, and sufficientarians have thus far not made tangible contributions to this relatively technical issue that takes us far away from the original claims that motivate sufficiency.

Secondly, such a view cannot account for a fundamental sufficientarian intuition. Non-uniform prioritarianism applies to benefits as well. This means that sufficientarianism warrants benefitting a super-rich person versus an ultra-rich person. Yet, one of sufficientarianism's major arguments has always been that it would be absurd to demand redistribution among the very rich.²⁴ Hence, the notion that there can be 'enough' in distributive justice is contradicted by sufficiency understood as non-uniform prioritarianism.

3 *A sufficientarian argument for progressive taxation*

The indifference objection toward burdens accuses sufficientarianism of being objectionably indifferent to the distribution of burdens above the

given threshold. This indifference applies in particular to the issue of progressive versus regressive taxation. The previous section revealed that sufficientarianism has come under fire on this issue. Unlike its main rivals, egalitarianism and prioritarianism, sufficientarianism does not provide a straightforward justification for progressive taxation. Furthermore, current sufficientarian responses have failed to provide a convincing, distinctively sufficientarian approach to a fair distribution of burdens that does not need to borrow from its two main rivals. However, in what follows, I argue that sufficientarianism does actually entail progressive burdening—not only below, but also above the threshold. My argument neither depends on prioritarian nor egalitarian reasoning, nor does it require abandoning the claim that justice should not demand redistributions among the rich.

The positive thesis of sufficientarianism asserts that everyone ought to have enough. This, from a normative point of view, means that insufficiency is considered to be negative. Consequently, we should not only help those who are below the threshold, but reduce the risk of people ending up in a state of insufficiency.

Let me stress that facing the risk of falling below the threshold is not of intrinsic relevance here. That is, sufficientarianism does not need to be modified by a risk-related normative premise beyond the positive and negative thesis. Rather, reducing the risk of insufficiency is instrumental in reducing insufficiency as such in the future. Thus, reducing the risk of insufficiency directly derives from the positive thesis that there are weighty reasons to secure enough for everyone.

Consider a society in which everyone has enough. One group of people *S* has just slightly more than enough, while another group of people *R* has far more than enough. There is intuitive plausibility to assume that individuals in *S* face a higher risk of falling below the threshold than those in *R*. Under real world conditions, everyone faces the risk of being pushed below sufficiency, e.g. as a consequence of health problems or unemployment. However, these risks are less serious for the very well off. To illustrate this, imagine that an individual from group *S* and one from group *R* lose both legs in an accident. Consequently, both need to undertake expensive housing adaptations, experience a reduction in their income and rely on external service providers to support them in their everyday life. These circumstances reduce the quality of life of the individual from group *S* to a level below sufficiency. The individual from group *R*, however, can easily afford all necessary changes to continue living a sufficiently good life without legs.

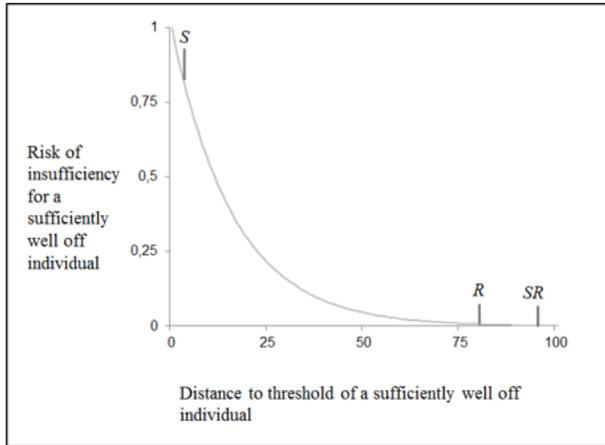
In short, burdens increase the risk of insufficiency by making individuals less capable of dealing with sufficiency-threatening circumstances. As a result, sufficientarians should favor placing heavier burdens on R compared to S , given that the sufficiency of individuals in group S is more jeopardized. Both S and R carry net burdens as long as someone lies below the threshold. Yet these burdens should be distributed progressively depending on the individual's distance to the threshold, i.e. her risk of insufficiency.

It would seem reasonable to expect that additional benefits reduce the risk of insufficiency considerably, eventually becoming marginally small. Consider a scenario in which there are two groups, one consisting of rich individuals (group R) and one of super-rich individuals (group SR). The risk of experiencing insufficiency is only marginally different for either group because they both have almost equally sufficient means to protect themselves against various potential causes of insufficiency. That is, at some point, a greater distance to the threshold ceases to significantly decrease the risk of insufficiency—thus, progressive burdening (or benefitting) would not apply under such circumstances. The sufficientarian belief that justice does not warrant redistributions among the rich remains unchanged because there is no difference in the risk of insufficiency between the rich and super-rich. This is an appealing facet of the argument, given that one of sufficientarianism's core beliefs is that there can be 'enough' in justice, i.e. that a state in which everyone is so well off that no further redistribution is necessary.

Conceptualizing the risk of insufficiency as a function of distance to the threshold allows for progressive taxation within sufficientarianism. This function has two properties. First, it has a positively decreasing slope, i.e. the better off someone is, the less risk she faces. Secondly, the slope of the curve eventually becomes marginally small, i.e. there is no significant difference in risk between the rich and the super-rich. The above graph is an example of a curve with such characteristics.²⁵

The idea of diminishing risk may appear prioritarian because it de facto prioritizes the interests of the worst off as opposed to the interests of those who lie above the threshold. However, reference to the risk of insufficiency is a distinctively sufficientarian rationale for progressive taxation above the threshold. Those slightly above the threshold should not be taxed less because they are worse off than those who are well above the threshold. Instead, they should be taxed less because they face the risk of insufficiency. This justification neither depends on prioritarian,²⁶ nor on egalitarian reasoning, because redistribution is not

Figure 2: Risk of insufficiency as a function of distance to the threshold



justified with an appeal to equality. Rather, the (sufficientarian) rationale for progressive taxation is the prevention of insufficiency of those who are above the threshold to the furthest possible extent.

Further, the risk argument does not depend on discontinuity. All described scenarios are compatible with continuous progressive taxation in relation to risk, while those below the threshold receive benefits based on continuous progression. The threshold marks the demarcation line between net benefits and net burdens, but not a discontinuity within a moral calculus. There could, of course, be discontinuities in risk among those above the threshold, which then translate into discontinuous progressive taxation. There may or may not be good reasons for such a viewpoint. Yet, the validity of sufficientarianism as a doctrine of distributive justice neither depends on it nor can it be reduced to it.

The argument applies to taxation and to the distribution of burdens in general. Note that this line of reasoning could be the nucleus of a promising response to the indifference objection to benefits. Reconsider Casal's claim that it seems unfair that some inherit luxury items while others inherit little more than a name—even if everyone has enough.²⁷ If those who inherit nothing lie only slightly above the threshold and the wealthy heirs find themselves a lot further above the threshold, redistribution to the former could be defended analogously to the argument presented here, i.e. by reference to their risk of insufficiency. However, if those who inherit little more than a name are very well off and the rich

heirs are even better off, there would no justification for redistribution.²⁸

4 *Objections and further considerations*

In the previous section, I claim that sufficientarians can justify progressive burdening by referring to the risk of insufficiency. In this section, I discuss a number of objections against this argument.

Excessive, not progressive

Some critics doubt that sufficientarianism can justify progressive taxation under the empirical conditions of the modern welfare state. It has been argued that sufficientarianism would, in practice, call for a much more demanding system than that established in the modern welfare state. Their argument is based on what is sometimes called the ‘lexical priority objection’ to sufficientarianism.²⁹ Sufficientarianism gives no weight to benefits that individuals who lie above the sufficiency threshold enjoy, but places emphasis on benefits provided to those who are below the threshold. This is intuitively plausible in many cases, something even critics of sufficientarianism admit.³⁰ Yet there seems to be no limit to burdening those who lie above the threshold in order to generate means for redistribution to those who are worst off. In many cases, it will be very challenging and costly to raise a person above sufficiency. Ultimately, this could mean that a marginal tax rate of 100% for those above the threshold is justified to raise particularly challenging cases above sufficiency level. Progressive taxation would then only apply under hypothetical circumstances—in practice, sufficientarianism would require confiscating all benefits enjoyed by those who lie above the threshold.

However, lexical priority of those below the threshold does not necessarily imply excessive burdening. After all, sufficientarianism is committed to choosing efficient approaches to taxation. Some tax schemes ought to be avoided because they decrease economic incentives and thereby reduce the means available for distribution. A 100% marginal tax for those above the threshold greatly reduces incentives to work and thus also reduces the means available to fight insufficiency.³¹ This on the whole worsens the situation for those below the threshold; hence, such a taxation scheme will not find acceptance among sufficientarians. Accordingly, sufficientarianism allows balancing efficiency and progressivity for the well-being of those below sufficiency.³² In practice, this may well

lead to something like a progressive tax scheme in contemporary welfare states.

Let me stress that sufficientarianism would not insist on a progressive tax scheme under *all* circumstances.³³ For instance, regressive taxation could, all things considered, also have beneficial effects for those below the threshold.³⁴ In that case, it may then be warranted. One may question whether there should not be stronger, conceptual reasons to favor progressive taxation, which do not depend on empirical circumstances. Yet why does there have to be something inherently just about progressive taxation? As Nagel and Murphy note, we should not ask ourselves whether a given taxation rate is just, but assess the justice of the overall package of market outcomes, government taxation and expenditure policies.³⁵

The perfect welfare state

Scenarios in which no one faces a significant risk of insufficiency could be considered. In such scenarios, sufficientarianism would not call for progressive taxation. For instance, imagine a perfect welfare state that is able to raise everyone above the sufficiency threshold (at least whenever this can be achieved by redistributing resources). Moreover, as soon as anyone falls below the threshold, the welfare state effectively and quickly lifts this individual above the sufficiency threshold. Under such circumstances, ordinary as well as super-rich individuals face the same risk of insufficiency. Hence, progressive taxation would not be justified.

I shall first note that it is difficult to see how a non-progressive tax system could be capable of generating enough tax revenue for a perfect welfare state to materialize. After all, we should expect regressive schemes to generate less tax revenue (even though, as stated above, some disagree with this). Random tax schemes will perform even worse, e.g. a system that determines taxes on the basis of a lottery. The insecurity and unpredictability such a tax scheme generates would be extremely costly. To attain a perfect welfare state or something close to it, progressive taxation or at least some kind well-defined system is needed.

But let us, for sake of argument, consider an ideal welfare state that can be realized on the basis of either a progressive or regressive tax scheme alike. Note that sufficientarians would still not necessarily be indifferent to taxation in this case. Since everyone who lies above the threshold faces an equal risk of insufficiency in this scenario, a sufficientarian would instead argue that everyone should be taxed equally. It is

not entirely clear what this precisely implies: it could mean that everyone pays an equal absolute amount of tax (regressive), an equal percentage of income (proportional) or makes an equal sacrifice (progressive).³⁶ I cannot delve deeper here into the issue of equality in taxation. What is important though is that sufficientarians would again not be indifferent to which tax scheme is chosen.

Now, this may sound suspiciously egalitarian, since in an ideal welfare state, everyone's risk is effectively equalized. Is this then simply a re-introduction of egalitarian ideals through the back door? I do not think so. The argument put forward does not depend on ascribing moral value to equality. The ideal welfare state does not strive to make all persons equal, but to keeping everyone above sufficiency. This is its only normative justification within a sufficiency framework, while equalizing risk is merely a side product that emerges under very specific and highly stylized circumstances—and it might be wise to not rely too much on our intuitions in such examples. It is clear that the ideal welfare state is far from real-world implementation. Realistically, there will always be people below the threshold, and the goal of redistribution should be to improve their situation. Progressive taxation will very likely be instrumental in moving toward this goal in the world we live in.

Individual risk factors

Another objection to the argument presented here is that equal distance to the threshold does not always correspond with equal risk. Certainly, a person who is better off is usually better placed to deal with sufficiency-threatening situations. But that person's overall risk of insufficiency depends on his or her individual circumstances, not just on his or her distance to the threshold. Individuals who are equally well off may have very different risk profiles. Consider two individuals above the threshold, who are equally well off. One is in frail health through no fault of his own and consequently has high medical expenses. The other individual is healthy and does not face such problems and costs. It seems that the risk of insufficiency is very different for these two individuals, although their distance to the threshold is identical. This indicates that the risk of insufficiency is not a function of distance to the threshold. However, this very claim is supposed to provide a sufficientarian justification for a progressive tax system.

Obviously, our example reveals that individual factors can increase or decrease the risk of insufficiency, irrespective of distance to the thresh-

old. However, what seems plausible, nonetheless, is that distance to the threshold is the starting point and a key indicator to determine the risk someone faces to fall below the threshold. The reason is that an individual who is better off is also better equipped to deal with sufficiency-threatening circumstances. In the absence of additional relevant information about a person's risk profile, we should burden such an individual to a lesser extent than someone who is better off.

Sufficientarians should concede that the risk of insufficiency is not determined entirely by distance to the threshold alone, and, consequently, individual risk factors should play a part in how we tax individuals. Needless to say, it is difficult to determine which factors shall be taken into account here and to what extent. What seems important, among other factors, is whether a risk results from voluntary action and whether it is related to central areas of human life. Some people may face larger risks of insufficiency due to voluntary choices, e.g. because they engage in an extremely dangerous sport or because they enjoy the thrill of travelling to countries waging war. It does not seem plausible to argue for lesser burdens for such persons. Having children, however, is also (usually) a voluntary choice that increases the risk of insufficiency by creating additional responsibilities and costs for an individual. Yet one may argue that such a risk should be acknowledged in taxation because it relates to a central area of human life.³⁷

More could be said about this, but it goes beyond the scope of this article to provide a full discussion here. What is important at this point is that distance to the threshold *ceteris paribus* determines risk of insufficiency, but additional relevant circumstances affect individual risk profiles. Some of these individual risks should be taken into account in taxation rates (e.g. someone with high health-related costs should be able to deduct these expenditures from his taxable income). This is much in line with existing progressive tax schemes, which, *ceteris paribus*, tax equal wealth to an equal extent but acknowledge certain tax deductions.

Money and sufficiency currencies

A final objection to my main argument is that it implicitly assumes a material understanding of sufficiency, which is neither plausible nor shared by most advocates of sufficientarianism. This relates to the question of what it is that there ought to be enough of or, put differently, what the appropriate currency for sufficiency is. Introducing the doctrine of sufficiency, Harry Frankfurt explicitly refers to money as a currency.³⁸

I shall refer to this alternative to egalitarianism—namely, that what is morally important with respect to money is for everyone to have enough—as “the doctrine of sufficiency.”

In the same article, Frankfurt introduces the idea that it is *contentment* with one’s material resources that matters for sufficiency, thereby introducing another currency for sufficiency beyond a mere material understanding.³⁹ As subsequent sufficientarians have added *capabilities*, *welfare* and *needs* to the list of potential sufficiency currencies, this ambiguity continues to persist.⁴⁰ There is no consensus on what the appropriate sufficientarian currency is.

Understanding the risk of insufficiency as a function of distance to the threshold implicitly assumes a monetary understanding of this distance. But welfarist sufficientarianism, for example, does not necessarily assume that those who lie far beyond the threshold are rich. Imagine two individuals for whom a successful romantic relationship is the most important determinant of welfare. One of the two has a medium income and is happily married. Hence, she enjoys a high level of welfare that is well above the sufficiency level. The other individual is a billionaire who is caught up in the midst of a lengthy and emotionally draining divorce. Her welfare level, on the other hand, is only slightly above the sufficiency level. If welfare sufficientarianism determined the risk of insufficiency based on distance to the threshold, it would in this case have to burden the individual earning a medium income more than the billionaire because she lies farther above the sufficiency threshold.

This, of course, is extremely counterintuitive. However, let me note that a welfarist sufficientarian does not need to draw such a conclusion. Taxing the unhappy billionaire does not increase her risk of sufficiency, because her risk of insufficiency does not relate to resources. Taxation by definition is concerned with material aspects, and higher taxation only increases resource-related risks. With respect to that risk, the unhappy billionaire is still in a much better position than a happy person with an average income. There is nothing contradictory for a welfarist to accept such reasoning, given that welfarists will not deny that resources play an important role for reaching a certain level of welfare.

5 Conclusion

Sufficientarianism has been criticized for being objectionably indifferent to how burdens are distributed in society. A particularly powerful variant of the objection states that sufficientarianism is indifferent to how

taxation schemes are set up. This article has shown that this is not the case. It argues that the risk of future insufficiency *ceteris paribus* decreases if someone lies farther above the threshold. Consequently, to prevent individuals from falling below the sufficiency level in the future, even those who are above the threshold should be taxed progressively.

This rationale for progressive taxation does not depend on prioritarian or egalitarian reasoning. Furthermore, it does not hold under all but only under realistic empirical circumstances and maintains the sufficientarian belief that there should be no redistribution among the rich and super-rich. Finally, there is a potential to extend this argument to other types of the indifference objection. The arguments presented here should be instrumental in defending sufficientarianism against one of the major objections the theory currently faces.

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Notes

1 [8]; [21, p.114]; [2, p.2].

2 [2]; [5]; [21].

3 Note that there could be more than one threshold, as in [2]; [3].

4 [5]; [21]; [23].

5 [21, p.104].

6 [6]; [3].

7 [5, p.307].

8 [21, p.104].

9 See [23, pp.65f] for this objection.

10 [16].

11 [20]; [14].

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- 12 [20, pp.64;88]. The following argument goes back to Christopher Freiman who mentions a number of additional cases that refer to allocative justice scenarios by friends and foes of sufficientarianism alike ([10, pp.35f]).
- 13 Indeed, one may argue that Harry Frankfurt is a *prima facie* egalitarian in allocative justice. Frankfurt claims that we should give everyone an equal share in the absence of any specific knowledge about the present people ([9, p.151]).
- 14 [16, pp.25–30].
- 15 [5, p.311].
- 16 [22, p.50].
- 17 Rawls’ “A Theory of Justice”, for instance, devotes only four pages to taxation, arguably the most important burden in well-ordered societies ([20, pp.277–280]). A notable exception of this tendency to neglect burdens is [16].
- 18 [13, p.189].
- 19 [8].
- 20 [21, pp.102f].
- 21 See, for example, [6, pp.758–760]; [21, pp.108–111]; [10, p.33].
- 22 [21, pp.108–111].
- 23 [21, pp.109f].
- 24 [6]; [8].
- 25 Other curves could satisfy these properties, e.g. curves with an initially proportional decrease or a convergence value $y > 0$.
- 26 Here, it differs from non-uniform prioritarianism which holds that those who are worse off but lie above the threshold receive more weight within a maximization calculus because their level of well-being is lower.
- 27 [5, p.311].
- 28 Of course, a sufficientarian who endorses progressive taxation based on the risk argument may reject extending this reasoning to benefits scenarios. My point here is merely that sufficientarians could, in principle, extend this argument to respond to the indifference objection to benefits.
- 29 This critique states that sufficientarianism objectionably allows small gains below the threshold to outweigh large gains above the threshold. See [1, pp.26–33]; [11]; [25]; [10].
- 30 For example, it seems plausible to relieve the burden of a small group of poor people (thereby raising them to sufficiency) rather than providing a piece of chocolate to a very large group of rich people who are well above sufficiency ([25, p.475]; [4]; [6]). Such cases are occasionally used as a “tyranny of aggregation” objection to prioritarianism. Sufficientarianism escapes the tyranny of aggregation, thereby becoming vulnerable to the “tyranny of disaggregation” ([1, p.30]).
- 31 [10, p.36].
- 32 Here sufficientarianism is much in line with the economics of taxation, which generally recognizes the importance of tax efficiency ([12]) and the need to balance efficiency with other normative considerations ([7]; [24]).
- 33 This is where sufficientarianism parts from telic egalitarian conceptions that intrinsically value equality and therefore object regressive taxation in principle

- because it increases inequality. Things are not as straightforward for deontic egalitarianism. See [19] for a discussion of telic versus deontic egalitarianism.
- 34 McGee argues that such empirical conditions are actually true for the world we live in ([15]). Other authors emphasize that progressive taxation is more effective in bringing about overall social welfare ([17]).
- 35 [16, pp.25–30].
- 36 [16, pp.12–39].
- 37 See [2, pp.4–8] on the relevance of central areas of human life for sufficiency.
- 38 [8, pp.21f].
- 39 [8, pp.37–39]. In what follows, I use the notion of monetary and material resources interchangeably. Thereby, I refer to means to provide an affordable access to things such as food, consumer goods, shelter, educational institutions, mobility, energy services and health care.
- 40 See [2] for capabilities, [6] for welfare, and [18] for needs. Some sufficientarians mix these approaches (e.g. [3]; [13]) or remain neutral to questions of value ([21]).

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References

- [1] Arneson, R. (2006). Distributive Justice and Basic Capability Equality: ‘Good Enough’ Is Not Good Enough. In A. Kaufman (Ed.), *Capabilities equality. Basic issues and problems* (Vol. 18, pp. 17–43). New York, London: Routledge.
- [2] Axelsen, D. V., & Nielsen, L. (2014). Sufficiency as Freedom from Duress. *Journal of Political Philosophy*.
- [3] Benbaji, Y. (2005). The Doctrine of Sufficiency: A Defence. *Utilitas*, 17(03), 310–332.
- [4] Benbaji, Y. (2006). Sufficiency or Priority? *European Journal of Philosophy*, 14(3), 327–348.

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- [5] Casal, P. (2007). Why Sufficiency Is Not Enough. *Ethics*, 117, 296–326.
- [6] Crisp, R. (2003). Equality, Priority, and Compassion. *Ethics*, 113, 745–763.
- [7] Feldstein, M. (1976). On the Theory of Tax Reform. *Journal of Public Economics*, (6), 77–104.
- [8] Frankfurt, H. (1987). Equality as a Moral Ideal. *Ethics*, 98, 21–43.
- [9] Frankfurt, H. G. (1999). *Necessity, volition, and love*. Cambridge: Cambridge University Press.
- [10] Freiman, C. (2012). Why Poverty Matters Most: Towards a Humanitarian Theory of Social Justice. *Utilitas*, 24(01), 26–40.
- [11] Gosseries, A. (2011). Sufficientarianism. In E. Craig (Ed.), *Routledge Encyclopedia of Philosophy*. London: Routledge. Retrieved from <https://www.rep.routledge.com/articles/sufficientarianism> (Sep, 13th, 2015)
- [12] Hamlin, A. (2014). *What Political Philosophy should learn from Economics about Taxation*. Retrieved from <http://www.socialsciences.manchester.ac.uk/>
- [13] Huseby, R. (2010). Sufficiency: Restated and Defended. *Journal of Political Philosophy*, 18(2), 178–197.
- [14] Lamont, J., & Favor, C. (2012). Distributive Justice. In E. N. Zalta (Ed.), *The Stanford Encyclopedia of Philosophy*. Retrieved from <http://plato.stanford.edu/archives/spr2013/entries/justice-distributive/> (Sep, 13th, 2015)
- [15] McGee, R. W. (1998). Is the Ability to Pay Principle Ethically Bankrupt? *Journal of Accounting, Ethics & Public Policy*, 1(3), 503–511.
- [16] Murphy, L. B., & Nagel, T. (2002). *The myth of ownership: Taxes and justice*. Oxford, New York: Oxford University Press.
- [17] Oishi, S., Schimmack, U., & Diener, E. (2012). Progressive taxation and the subjective well-being of nations. *Psychological science*, 23(1), 86–92.

- [18] Page, E. A. (2007). Justice Between Generations: Investigating a Sufficientarian Approach. *Journal of Global Ethics*, 3(1), 3–20.
- [19] Parfit, D., 2000. Equality or priority? In: M. Clayton and A. Williams, eds. *The Ideal of Equality*. Basingstoke, 81–125.
- [20] Rawls, J. (1971). *A theory of justice* (Original edition). Cambridge, Mass: Belknap Press.
- [21] Shields, L. (2012). The Prospects for Sufficientarianism. *Utilitas*, 24(01), 101–117.
- [22] Shue, H. (1993). Subsistence Emissions and Luxury Emissions. *Law & Policy*, 15(1), 39–59.
- [23] Temkin, L. S. (2003). Equality, Priority or what? *Economics and Philosophy*, 19(1), 61–87.
- [24] Weinzierl, M. (2014). The promise of positive optimal taxation: normative diversity and a role for equal sacrifice. *Journal of Public Economics*, 118, 128–142.
- [25] Widerquist, K. (2010). How the Sufficiency Minimum Becomes a Social Maximum. *Utilitas*, 22(04), 474–480.