Is Perfect Obedience To The Law Possible?  
A Re-Examination Of Galatians 3:10

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The precise nature of Paul’s argument in Gal 3:10 is a subject of debate today. The verse reads as follows: “For all who rely on works of the law are under a curse; for it is written, ‘Cursed be everyone who does not abide by all things written in the book of the law, and do them’” (RSV). The question we want to explore is the logical relationship between the two assertions that are made in the verse, for it is obvious that Paul thought that the citation from Deut 27:26 was support for the assertion that he made in Gal 3:10a.

Most older commentators maintained that there was an implied proposition that made the verse clear—viz., the notion that it is impossible to keep the law perfectly.1 Paul’s point, according to this view, was quite simple. The reason that all those who are of the works of the law are under a curse is because Deut 27:26 demands that one obey the law perfectly to merit God’s favor. Paul does not bother to say that no one could obey the law perfectly because such a statement was so obvious that it did not need to be said. If this view is correct, Paul’s reasoning was as follows: (1) All who do not keep the law perfectly are cursed (Deut 27:26 cited in Gal 3:10b). (2) No one can keep the law perfectly (implied premise). (3) Therefore, all who rely on the works of the law are under a curse (Gal 3:10a).

In recent years, however, the above interpretation of Gal 3:10 has been the target of increasing criticism. In this article we shall examine and evaluate the views of several scholars who take issue with the traditional understanding of Gal 3:10.

D. P. Fuller, in a stimulating article, contends that the addition of an implied proposition to Gal 3:10 is a “highly arbitrary procedure.”

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If Paul wanted to argue that no one could fulfill the law perfectly, then he would have said: “All who do not comply with what the law demands are under a curse (10a), for the law itself invokes a curse on those who do not obey it (10b).” Instead, Paul seems to say the exact opposite: The curse is on those who are conforming to the law’s commands, and nothing is said about a failure to observe the entire law. The view that Paul is speaking of the impossibility of keeping the law in Gal 3:10 is flawed because the verse is comprehensible without the addition of a so-called implied proposition.

But if Fuller is correct, then why is Paul criticizing the Galatians for being devoted to the works of the law? Fuller, following the lead of R. Bring, claims that the phrase “works of the law … does not represent what the law itself commands, but rather the Jewish misinterpretation of the law.” Paul’s rebuke is directed not against law-observance itself but against a legalistic distortion of the law. Such an understanding of the phrase “works of the law” is sensible because Paul’s opponents in Galatia were Judaizers.

If Fuller is correct in his interpretation of “works of the law,” then the next question is the interpretation of Deut 27:26 in Gal 3:10, for the verse on first blush seems to condemn those who are not observing the law and not those who are legalistically devoted to the law. Fuller argues, however, that Deut 27:26 in the context of Deuteronomy 27 refers to “the legalistic frame of mind, which seeks to earn God’s favor … since it involves trying to bribe God to impart blessing on the basis of good works that one does.” According to Fuller, then, Paul cites Deut 27:26 in Gal 3:10 because the former verse itself is a condemnation of legalism and the Galatians were succumbing to a similar error.

H. D. Betz in his magnificent commentary on Galatians devotes careful attention to the interpretation of Gal 3:10. We will need to examine Betz’s argument against the usual interpretation of the passage with extreme care.

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3 3. Ibid., p. 32.
5 5. Fuller, “Paul” 32–33.
because his reasoning is complex and hard to follow. Betz begins his discussion on the issue we are investigating by describing the interpretation of H. J. Schoeps.

Hans Joachim Schoeps assumes that Paul’s intention is to show the unfulfillable nature of the Torah from the Torah itself: everybody is under the curse of the law because nobody is able to keep the whole law. Paul does not state this explicitly because for him it is self-evident.7

This exposition of Schoeps’ view is concise and clear, and it is obvious that Schoeps holds the traditional view of the passage.

Betz then proceeds to criticize Schoeps’ view. He says, “However, this argument e silento is not convincing: Paul not only fails to say what Schoeps thinks is self-evident, but in fact he says the opposite.”8 It is immediately clear that Betz does not subscribe to the traditional way of understanding the passage. But what does Betz mean when he says that Paul’s view was precisely the opposite of Schoeps’ explanation? In the footnote Betz cites Gal 1:13–14; 3:19–25; Phil 3:6–8; and 2 Cor 11:18 ff.9 Gal 1:13–14 and 2 Cor 11:18 ff. describe Paul’s advancement in Judaism and his devotion to the ancestral traditions. In these passages Paul gives no indication that he felt any inner struggle over his failure to keep the law perfectly, so perhaps Betz is citing these passages to show that Paul himself was an example of one who kept the law entirely. This surmise on our part seems strengthened when one examines Phil 3:6–8, for there Paul specifically says that he was blameless in the righteousness that was according to the law. However, the citation of Gal 3:19–25 does not fit easily with the above explanation because in that passage Paul makes it clear that all are under sin. A further examination of Betz’s position is necessary before we can render any final decision about what he is saying.

Betz’s very next sentence after the one in which he says that Paul held the opposite view of Schoeps reads as follows: “The Law was given to generate sin; sin is not the result of man’s inability to keep it but the necessary presupposition for salvation.”10 This sentence is difficult to understand, and we cannot examine it in detail here. However, Betz is clearly affirming that the law provokes sin. The question is: How does this statement harmonize with the notion that one can observe the law completely? We have already noted in the prior paragraph that Betz seems to claim that entire obedience of the law is possible. If we are

7 7. Ibid., p. 145.
8 8. Ibid.
10 10. Ibid., pp. 145-146.
interpreting Betz correctly there seems to be some sense in which one can obey the law perfectly and yet at the same time be sinning.

Betz’s unique view of the law lends some support to this interpretation. He distinguishes between God’s Torah and the Jewish Torah.

The question is only whether the Jewish concept of “works of Torah” can lead to the fulfillment of the Torah. This Paul denies. The Jewish Torah given on Mount Sinai was an inferior entity, not intended to provide eternal life (3:21) but given “because of transgressions.”

Betz’s view seems to be that Paul believed that one could obey the Jewish Torah perfectly. In fact, Paul thought that he himself had performed such a feat. Obedience to the Jewish Torah, however, did not mean that one was without sin. Indeed, Paul believed that one was transgressing the true Torah of God (the Torah of Christ) while one was observing the Jewish Torah.

The most recent commentary on Galatians comes from the pen of F. F. Bruce. Bruce’s explanation of the reason for the curse in Gal 3:10 seems to be clear on first glance, for he says of Paul: “Here, however, he is concerned to stress the unfulfillable character of the law: by the standard of the law every one is ‘under a curse’ because no one is able to keep it in its entirety.” The above explanation is the traditional interpretation of the verse, and it seems to express Bruce’s view clearly.

However, Bruce proceeds to ask the question, “Why is the curse incurred by all who rely on legal works for justification?” He proposes two possible solutions: (1) Does the curse fall on all because no one can keep the law perfectly? (2) Is a person liable to the curse of the law even if one performs the entire law? Bruce opts for the second viewpoint and says, “But does Paul mean that even for one who does persevere in doing all things written in the book of the law justification is not thereby assured? It appears that he does.” Bruce then cites Phil 3:6, 9 to show that even though Paul was blameless in law-righteousness, he was not justified for this reason but because of his faith in

11 11. Ibid., p. 146.
13 13. Bruce, Epistle 159.
14 14. Ibid.
15 15. Ibid., p. 160.
Christ. The objection to the view that Bruce sets forth is that the citation of Deut 27:26 in Gal 3:10 seems to imply that the one who does obey the law completely will escape from the curse of the law. Bruce recognizes this objection and replies that Gal 3:11 shows that even if one does observe the whole law, one is not thereby righteous because Hab 2:4 declares that one can only be righteous by faith. Any form of legal righteousness is precluded.\footnote{16}

Bruce has not forgotten, however, his statement on the unfulfillability of the law. It seems that his view is as follows: Even though it is true that no one can fulfill the law (except Paul?), it is not for this reason that one is cursed. Even if one could fulfill the law completely, the curse would still be pending because righteousness comes only via faith.\footnote{17} In my opinion, however, this does not resolve all the problems with Bruce’s view, as will be explained later.

G. Howard in a recent monograph discusses the interpretation of Gal 3:10.\footnote{18} He questions the validity of the usual interpretation and explains his view.

To keep the law then was, among other things, to find cultic forgiveness for breaking the law. For Paul to have argued that the law demanded absolute obedience and that one legal infraction brought with it unpardonable doom would have been for him to deny what all the world knew, namely, that the Jerusalem temple stood as a monument to the belief that Yahweh was a forgiving God who pardoned his people when they sinned.\footnote{19}

Howard thinks that it is improbable that Paul was teaching that one infraction of the law placed one under a curse. After all, Paul was a Jew and he knew that the cultic system of the OT made provision for the sins of the covenant people.

The last interpretation that we want to examine is H. Schlier’s. Schlier argues that Paul is not saying that no one can obey the law. Instead, Paul’s point is that all those who rely on performing the Torah are under a curse.\footnote{20} The curse comes on anyone who focuses on doing the Torah instead of believing in Messiah.

At this point we will examine the tenability of the interpretations that we have presented. The key to Fuller’s view of Gal 3:10 is his interpretation of Deut 27:26. The relevant part of Deut 27:26 for our purposes reads as follows: “Cursed be he

\begin{footnotes}
\item[16] Ibid.
\item[17] Ibid.
\item[19] Ibid., p. 53.
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who does not confirm the words of this law by doing them” (RSV). Fuller, as we have seen, claims that Deut 27:26 condemns the sin of trying to bribe God on the basis of good works. Such an explanation of Deut 27:26 supports the idea that the reason for the curse in Gal 3:10 is a legalistic adherence to the law.

Fuller’s view is flawed, however, because neither Deuteronomy 27 as a whole nor Deut 27:26 in particular denounces the sin of legalism. The reason that the curses are exacted is not because someone legally observes the law; rather, the curses fall upon one who does not observe some part of the law.\(^{21}\) A glance at a few of the verses shows that this is what the author had in mind. One is liable to the curse if one makes an idol (v 15), or dishonors his father and mother (v 16), or lies with his father’s wife (v 20), or slays his neighbor in secret (v 24). Fuller refers to the sin of bribing God, which involves trying to earn merit in his sight, and v 25 does mention the sin of bribing. However, the bribe that is discussed in v 25 has nothing to do with bribing God; instead, a curse is pronounced upon any person “who takes a bribe to slay an innocent person.” Verse 25, therefore, is not a condemnation of the sin of bribing God; rather, the verse is simply a condemnation of the practice of taking a bribe from another human being with the result that someone is murdered. It is clear that this verse is consistent with the rest of Deut 27:15–26, for the curse is pronounced if the law against bribing has been violated.

An examination of the context of Deuteronomy 27 helps us understand Deut 27:26. Verse 26 is different from the prior verses because no particular infraction of the law is mentioned. Instead, the verse contains a generalizing summary: “Cursed be he who does not confirm the words of this law by doing them.” There is no indication here that the author of Deuteronomy is condemning any kind of legalism.\(^{22}\) What he is censuring is the failure to perform any part of the law. Such an interpretation of v 26 is consistent with the reason for the curses in 27:15–25—viz., the curses are enunciated if one fails to observe the law in some way.

It is unlikely, therefore, that in Gal 3:10 Paul cited Deut 27:26 because the latter condemned the sin of legalism. The simplest way of reading the quotation, and it is one that accords with the OT context, is that Paul is saying that there is a curse on anyone who does not observe the law entirely. Such an interpretation is strengthened when one observes that Paul, in basic agreement with the LXX, uses a Scripture text that pronounces a curse on anyone who does not abide by all


\(^{22}\) 22. Bruce, *Epistle* 158, maintains that Fuller’s view is strained and improbable.
things (pasin) written in the book of the law, to do them. It is very important to note that the MT does not have any word in Deut 27:26 that corresponds to the word pasin in Gal 3:10. It is fair to conclude, therefore, that Paul’s use of the word pasin clearly implies that the curse was pending if one did not observe any part of the law.

Fuller also claims that a proper interpretation of “works of the law” supports the notion that Paul is censuring legalistic law-observance in Gal 3:10. We agree with Fuller that the Judaizers were legalistic, and that they were trying to use their obedience to the law as a means to earn merit before God. We also agree that this is a distortion or misinterpretation of the law, although one may argue that such a distortion is inevitable in any nomistic religion, but we will not examine that latter point here. The point we are contesting is whether Paul is saying in Gal 3:10 that the reason that the Judaizers are under a curse is because they are legalistic. We have already seen that the OT citation is a clear condemnation of anyone who does not obey the law perfectly. Paul uses the phrase “works of the law” to show that even those who are most devoted to the law—even those who try to earn God’s merit by careful attention to every statute and every precept of the law—are doomed, because no matter how diligent they are to keep the law they cannot keep it perfectly.

Fuller’s objection here is that such a view adds the implied proposition to the verse that no one can keep the law entirely, and he thinks this is indefensible. However, the presence of an implied proposition should not be excluded out of hand. Implied propositions, after all, are a common feature of human language, and thus the real question is whether there is an implied proposition in this verse. For example, if I say, “All fairy-tale characters are fictitious,” and then remark that “Cinderella is fictitious,” it is logical to accept the implied proposition that “Cinderella is a fairy-tale character.” Of course, there are situations in which a character can be fictitious without the genre of the story being a fairy tale. But if I make the above statements consecutively, the implied proposition is so obvious that it goes without saying. We think the evidence supports a similar use of an implied proposition in Gal 3:10. Otherwise (if our interpretation of the citation of Deut 27:26 is correct) the citation of the OT passage would be meaningless. But it is most sensible to claim that Paul cited Deut 27:26 because he assumed that no one could obey the law (cf. Rom 3:9–20).

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23 Betz, Commentary 144–145, discusses the differences between the MT and LXX on Deut 27:26. Paul’s quotation is not exactly parallel with either text, but his citation is closer to the LXX. Bruce, Epistle 158, notes that the LXX rendering “lends itself readily to Paul’s argument.” He also remarks that Paul broadens the application of Deut 27:26, which pronounces a curse on one who does not obey the specific laws enunciated in 27:15–25, but Paul extends the curse to anyone who disobeys any part of the Torah.
We will evaluate the views of Betz and Bruce together since they seem to agree on a very significant item, but first we will analyze a view that is peculiar to Betz. Betz posits a radical distinction between God’s Torah and the Jewish Torah, arguing that the latter is inferior and temporary. Such a radical disjunction is unconvincing. Paul’s statement that the law was given “because of transgressions” and that it was given to Israel via the angels does not show that it is not God’s Torah (Gal 3:19). Paul specifically argues in Gal 3:21 that the law is not contrary to the promises of God. Bruce, commenting on Gal 3:19, rightly says that “even in Galatians the law is ultimately God’s law.” Bruce makes the same statement when commenting on Gal 3:21 and points out that Paul warns against a similar distortion of his message in Rom 7:7–12.

Betz’s methodological principle is to interpret Galatians alone, and he does not consider the evidence from Romans when interpreting Galatians and thus does not take into account Paul’s statements in Romans 7. Even if one does not consider Romans 7, Gal 3:21 itself is enough evidence to show that Paul did not deny that the Torah was God’s. Although Betz’s procedure of interpreting Galatians on its own terms rightly cautions us not to impose Romans on Galatians, he goes too far when he excludes Romans altogether. It is right and appropriate to consider what Romans has to say when Paul treats the same topic that he examines in Galatians. This is precisely the case in Romans 7, for in that chapter Paul counters the charge that his view of the law implies that he thinks the law is defective in any way. Paul stoutly affirms that the law is “holy and just and good” (Rom 7:12).

Now if Betz’s view of the law is incorrect, then one of his major propositions on the meaning of Gal 3:10 is damaged, for Betz appears to argue that one could keep the Jewish Torah completely and yet in doing this one would be violating God’s Torah. However, if one cannot separate the Jewish Torah from the Torah of God, then this argument is ineffective. We are not arguing that the Torah of God in the OT is the exact equivalent of the Torah of Christ (Gal 6:2) or of the law of love (Gal 5:14), for it is obvious that the role of the law has changed because of the advent of Christ (Gal 3:15–4:7). All we are claiming is that even if the OT Torah is no longer in force, while it was mandatory it was God’s law.

Both Betz and Bruce appear to claim that perfect obedience of the OT law was possible. Betz cites Gal 1:13–14; 2 Cor 11:18 ff. to support his view, but these verses can be dismissed as evidence for such a view. A careful examination of the verses shows that Paul does not claim that he kept the law entirely. All he maintains is that he was more scrupulous than his contemporaries in his observance of the law. His devotion to the law was remarkable and notable, and his commitment to the Torah was evident to all, but this says nothing about

24 24. Bruce, Epistle 175.
perfect obedience to the law. It simply says that Paul’s obedience was better than that of his contemporaries.

The key verse for both Betz and Bruce is Phil 3:6, for here Paul says that he was blameless “as to the righteousness under the law.” At first glance this verse seems to settle the question because if Paul says that he was blameless in legal righteousness, then his obedience to the law must have been flawless. This verse must be interpreted in its context to be understood rightly, however, and the context indicates that this is Paul’s pre-Christian evaluation of himself. As a Pharisee Paul thought that he kept the law perfectly, but Phil 3:3–4 makes it clear that this was Paul’s fleshly view of himself. Cranfield rightly explains Paul’s point in Phil 3:6.

He is indicating, not how he sees himself now that he is a Christian, but how he seemed to himself and to his fellows before his conversion. That “righteousness of mine own, even that which is of the law,” to which he refers (Phil 3:9), is an illusion of the Pharisee’s heart (cf. the reply of the rich man to Jesus in Mk 10:20).27

Phil 3:6 is used inappropriately and out of its context if it is used to support the notion that Paul believed that one could obey the law entirely. Indeed, it is even doubtful that in his Pharisaic days Paul thought that he kept the law entirely, for Paul’s blamelessness in Phil 3:6 probably included the notion that he went up to the temple and offered the required sacrifices. The point that Paul is making in Phil 3:6 is simply that his obedience to the law was superior to the obedience attained by his opponents.

Bruce’s view of Gal 3:10 is interesting because he emphasizes that one is cursed even if one does perform the law entirely, and he argues this on the basis of Gal 3:11. However, if it is true that no one can obey the law perfectly and that one who does not observe the law totally is under a curse, then such a point is completely hypothetical. At one point Bruce seems to state that the curse falls on all because they cannot obey the law, but later he emphasizes that all are cursed even if they obey the law. Here he is influenced by Phil 3:6, for he thinks this verse shows that Paul kept the law. If it is true, as we have argued, that no one can keep the law flawlessly, then Gal 3:10 alone sufficiently explains the reason why all are under a curse.

Howard’s interpretation of Gal 3:10 is particularly stimulating because he claims that Paul could not have demanded perfect obedience to the law, for such a demand would ignore the fact that the cultic system of the OT provided a means

of forgiveness for sin. Howard’s argument is defective because he fails to perceive the newness of Paul’s thought. After all, if Paul as a Christian believed that the cultic system of the OT could provide forgiveness, then the death of Christ was completely unnecessary. As Paul says in Gal 2:21, “if justification were through the law, then Christ died to no purpose.”

Paul’s very argument in Gal 3:10–14 excludes the OT cultic system as a means of forgiveness, for in Gal 3:13 he argues that the curse that Christ endured for believers is the only way to be “redeemed from the curse of the law.” There is no indication that Paul believed any longer that the offering of a sacrifice in the temple would suffice. Bruce rightly says that “the sacrificial ritual was ipso facto ineffectual. It had in any case been superseded by a provision which was supremely effectual. Christ had been set forth by God as a hilastérion.” Elsewhere, Bruce comments on Paul’s entire argument in Gal 3:10–13. “This argument would have been all of a piece with his swift and radical reappraisal of the place of the law in God’s ways with mankind.”

Howard’s view of the passage is useful because it helps us contrast Paul with the OT. The OT itself did not demand perfect obedience to the law, for Howard is correct that the cultus of the OT was the means to obtain forgiveness. But Paul’s thinking is new precisely because he argued that perfect obedience to the law was necessary for one to obtain justification. Of course such perfect obedience is impossible, and thus Paul argued that faith in Christ’s death on the cross was the only way to experience justification (cf. Rom 3:9–26).

Schlier’s notion that the curse of Gal 3:10 is due to the fact that a person performs the law is mistaken. Paul clearly states in Gal 3:21 that if righteousness could have been obtained by adherence to the law, then righteousness would have been by law. But such legal righteousness is not possible according to v 22 because all are under sin. Paul’s point here is that legal righteousness is excluded because no one can attain such righteousness. To use the language of Rom 3:23, “all fall short of the glory of God.” Schlier’s view is also problematic because the OT quotation in Gal 3:10 specifically states that the curse is on one who does not do all the things written in the book of the law. It may be true that in Gal 3:11–12 Paul is saying that even if one does obey the law, one will not gain righteousness anyway because righteousness can only be given to those who exercise faith. However, in the light of Gal 3:10 such a question is only a hypothetical one, for Paul argues in this verse that no one can obey the law perfectly.
Our examination of some recent alternative explanations of Gal 3:10 reveals that these novel interpretations are not convincing. The traditional notion that Paul is maintaining that the curse is incumbent on all who do not obey the law perfectly is the most compelling interpretation. The latter view explains in the most sensible manner the import of the OT citation in Gal 3:10. Paul’s claim that the OT itself curses those who do not abide by the law in its entirety is an effective statement only if one cannot obey it perfectly. The idea that Paul assumed that no one could obey the law perfectly explains why he believed that only Christ could remove the curse from humanity (Gal 3:13). Indeed, in Gal 2:21 Paul remarks that if justification were attainable by law-obedience, then Christ died for nothing.

Finally, the notion that perfect obedience to the law is impossible is in accord with Paul’s explicit statements on the matter in Romans. In Rom 3:9–20 (and 1:18–3:8 also, for that matter), Paul makes it clear that no one is righteous, that all fall prey to sin, that justification is impossible by law-obedience because the law only reveals our inability to keep it. Paul’s solution to the sin-problem in Romans is again parallel to Galatians, for in Rom 3:21–26 he maintains that Jesus’ death on the cross is the only way to appease God’s wrath. In conclusion, the idea that Paul is assuming that perfect obedience to the law is impossible in Gal 3:10 is the most satisfactory, for such a view explains most adequately the context and argument of Gal 3:10–14, and it is also in significant agreement with Paul’s theology as he expressed it in Romans.

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this verse in detail here, but Paul is probably reminding the Galatians that submission to circumcision is futile because if they submit to circumcision, they must obey the rest of the law as well, and in Paul’s view this obligation to obey the whole law is a duty the Galatians cannot possibly fulfill. For a similar view of Gal 5:3 see D. Guthrie, Galatians (Grand Rapids: Eerdmans, 1973) 129.