

Paul and Perfect Obedience to the Law: An Evaluation of the View of E. P. Sanders*

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E. P. Sanders is already well known for his groundbreaking and controversial work on *Paul and Palestinian Judaism*. His new work on *Paul, the Law, and the Jewish People* will probably be even more controversial, for Sanders argues that the conventional understanding of Paul's theology of the law is seriously mistaken. Paul did not, according to Sanders, say that the works of the law could not save because no one could possibly keep the law perfectly; there is no convincing evidence that Paul ever thought it was impossible to observe the law. Neither does Paul criticize works-righteousness because "it leads to legalism, self-righteousness and self-estrangement" (p. 46),¹ for it is a fallacy to say that Paul thought that adherence to the works of the law was legalistic. Instead, Paul was hostile to a Torah-centered righteousness only because such an orientation created and preserved a breach between Jews and Gentiles, and it supported the idea that Jews were superior to Gentiles. Paul attacked the Jewish notion of election and justification by law so that he could articulate the equality of both Jews and Gentiles: both are saved only by putting their faith in Christ.

It would be too ambitious in an article to describe and evaluate all that Sanders has to say on Paul's theology of the law. It is interesting to note that James Dunn has embraced, with some qualifications, the basic thesis propounded by Sanders and that he will

* E. P. Sanders, *Paul, the Law, and the Jewish People* (Philadelphia: Fortress, 1983. xi, 227. \$19.95).

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write his commentary on Romans from this "new perspective."² In this article we will summarize and analyze only one pillar of Sanders' argument. As we have

1 1. All page numbers listed in this article are from this work. All biblical quotations are from the RSV.

2 2. J. D. G. Dunn, "The New Perspective on Paul," *BJRL* 65 (1983) 95–122. Dunn's basic objection to Sanders' thesis is that Paul's rejection of Judaism becomes too idiosyncratic and arbitrary. One reason Sanders makes this mistake, according to Dunn, is because he fails to distinguish between "law" and "works of the law." Hans Hübner, in his recent work on the Pauline view of the law, is fundamentally opposed to the position of Sanders. (*Das Gesetz bei Paulus: Ein Beitrag zum Werden der paulinischen Theologie* [FRLANT 119; Göttingen: Vandenhoeck & Ruprecht, 1978]; "Pauli Theologiae

already pointed out, Sanders claims that Paul did not teach that it was impossible to keep the law perfectly. First of all, we will analyze how Sanders supports and defends his thesis that Paul thought it was possible to obey the law *in toto*. Second, we will subject Sanders' interpretation to critical scrutiny. How convincing and credible is his exegesis of the major Pauline texts on this issue?

I. An Exposition of Sanders' View

1. Galatians 3:10

Gal 3:10 is often used to support the idea that justification by works is unattainable, for no one can obey the law perfectly.³ The verse reads as follows: "For all who rely on works of the law are under a curse; for it is written, 'Cursed be every one who does not

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abide by all things written in the book of the law, and do them.'" At first blush the verse seems to be saying that those who are trusting in their observance of the law (ex ergōn nomou) are under a curse because no one consistently keeps the entire (pasin) law. In other words, the logic of Paul's argument can be described like this:

- (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 curse (Gal 3:10a).

Proprium" *NTS* 26 [1980] 445–73). Sanders maintains a continual dialogue with Hübner, particularly in the footnotes, throughout the book.

3 3. See my article "Is Perfect Obedience to the Law Possible? A Re-examination of Galatians 3:10," *JETS* 27 (1984) 151–60 n. 1, for a representative list of those who support this view. See also U. Wilckens, "Was heisst bei Paulus: 'Aus Werken des Gesetzes wird kein Mensch gerecht'?" *Rechtfertigung als Freiheit Paulusstudien* (Neukirchen-Vluyn: Neukirchener, 1974) 77–109; H. Hübner, "Gal. 3:10 und die Herkunft des Paulus," *KD* 19 (1973) 215–31; D. J. Moo, "'Law,' 'Works of the Law,' and Legalism in Paul," *WTJ* 45 (1983) 73–100, esp. pp. 97–98; H. Räisänen, "Paul's Theological Difficulties with the Law," *Studio Biblica: Papers on Paul and other New Testament Authors* (ed. E. A. Livingstone; JSNT Supp 3; Sheffield: JSOT Press, 1980) 3.308. We shall see later that Räisänen and Sanders agree on many fundamental issues concerning the Pauline theology of law, although on this point Räisänen differs from Sanders. Sanders prefers the rather awkward word "righteoused" instead of the term "justified," but we shall use the term "justified" instead of the word "righteoused" in this article.

Sanders, however, cautions against such a reading of the verse.⁴ In the first place, he notes, the situation behind the Galatian letter must be properly understood. Paul was not attacking Judaism in Galatians; instead, his polemic was against Christian missionaries who said “that Gentiles must accept the law *as a condition* of or a basic requirement for membership” (p. 19). Paul’s main objection to the position of the Christian missionaries was that they insisted on the observance of circumcision and the Mosaic law for membership in the covenant community. In other words, the letter to the Galatians is first and foremost a discussion on the entry requirement into the people of God. Paul insists that faith in Christ, not obedience to the Torah, is the entrance requirement. The important question for our purposes is this: does Paul argue in Gal 3:10–12 that the Mosaic law is not an entrance requirement because no one can keep it? Sanders maintains that this is *not* what Paul is saying, and he marshalls three reasons to defend his interpretation.

Sanders’ first argument is that in Galatians 3 Paul uses proof-texts with terms such as “Gentiles,” “righteous,” and “faith” to support the idea that Gentiles are justified by faith. Paul selects certain OT passages for his argument in Galatians 3 because they contain *the terms* which sustain his view that Gentiles are heirs of Abraham by faith. Sanders points out that this terminological approach to OT texts applies to Gal 3:10, for Paul quotes Deut 27:26 in this verse. But the reason Paul cited Deut 27:26 is not because the verse contains the word “all” (which would presumably prove that no one is able to obey the law). The only reason Paul cited Deut 27:26 is because this is “the only passage in the LXX in which *nomos* is connected with ‘curse’” (p. 21). The word “all” (*pasin*), according to Sanders,

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by chance occurs in a verse which has the two terminological keys that Paul is looking for, viz., *nomos* and *epikataratos*. Thus, the inclusion of the word “all” in Gal 3:10 is not exegetically significant because Paul chose to cite Deut 27:26 only because it contained the words “law” and “curse,” not because it contained the word “all.”

Sanders’ second argument relates to the role of proof-texts in Paul’s line of thought. Sanders declares that the key to understanding a Pauline proof-text is not to interpret the meaning of the proof-text; instead, one should only focus on Paul’s explanation of the proof-text. “I think that what Paul says in his own words is the clue to what he took the proof-texts to mean” (p. 22). Thus, in Gal 3:10 the key to understanding the verse is to see how Paul interprets Deut 27:26, and Paul’s understanding of Deut 27:26 is found in Gal 3:10a. In vs. 10 Paul is merely saying “that those who accept the law are cursed” (p. 22). So, according to Sanders, Paul is not making any statement about the possibility of fulfilling the law; he is simply condemning those who demand that the law be kept.

4 4. *Paul, the Law, and the Jewish People*, 17-23.

Sanders' third argument against the idea that Gal 3:10 proves that complete obedience to the law is impossible is as follows. The function of Gal 3:10–13 in the context of Gal 3:8–14 must be carefully understood. Paul's thesis statement is found in Gal 3:8: he asserts that Gentiles can only be justified by faith. The OT citations in Gal 3:10–13 do not substantially further Paul's thesis, but they do provide OT support for his contention that the Gentiles are justified by faith. Paul's conclusion in Gal 3:14 clearly shows the direction of his argument; all Paul wants to demonstrate is that God justifies the Gentiles by faith. Thus, Sanders concludes that the subsidiary function of Gal 3:10–13 in Paul's argument shows that he was not trying to demonstrate that it is impossible to keep the law. He says: "These three considerations... seem to me to be decisive against the view that the thrust and point of the argument are directed toward the conclusion that the law should not be accepted because no one can fulfill all of it" (p. 22).

It is necessary at this point to sum up Sanders' basic understanding of Galatians 3. He claims that Paul is not giving *reasons* to support his idea that no one can be justified by the law; instead, Paul, who was a master of Jewish exegetical arguments, uses the OT to prove the validity of his position (p. 26). In other words, the reason Paul asserts that justification is not by the law is because he believes that justification is only through Christ (p. 27). "This helps us see that

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the problem with the law is not that it cannot be fulfilled. Paul has a view of God's intention which excludes righteousness by the law; his position is dogmatic" (p. 27). From the very beginning, then, Paul's assumption that salvation comes only through Christ excluded by definition the possibility that salvation could come via the law. In conclusion, Paul did not argue in Galatians 3 that righteousness was not by law because it was impossible to fulfill all of it; instead, Paul's main purpose was to show that both Jews and Gentiles are saved by faith, showing thereby that both groups are equal before God.

2. Other Major Pauline Texts

Sanders briefly considers several other major Pauline passages on the fulfillability of the law.⁵ In Phil 3:6 Paul asserts that when he lived under the law his righteousness according to the law was blameless. One might think that Sanders would say that this verse conclusively demonstrates that Paul thought it was possible to fulfill the entire law. However, he seems to be reluctant to draw this conclusion, saying that Paul's statement may be an example of a rhetorical flourish (p. 23).

On the other hand, Romans 7, Rom 3:23, and Rom 5:12 all seem to indicate that Paul believed in universal sinfulness. Sanders thinks Rom 3:23 is on first glance the most convincing piece of evidence for the view that since no one can

5 5. Ibid., 23-25.

keep the law completely, then righteousness must be through faith. Nevertheless, one must not use Rom 3:23 to reconstruct Paul's view of the law because it is well known that this verse contains pre-Pauline tradition (pp. 23-24).

Sanders says that Rom 5:12 and Phil 3:6 seem to conflict, for the former speaks of universal sinfulness and the latter of perfect obedience of the law. At this point Sanders seems to conclude that Phil 3:6 does provide evidence for the view that one could keep the whole law. He notes, however, that since Paul's letters are occasional and situational it may have never occurred to Paul that the two statements are in conflict. Or, Paul may have thought that it was possible to obey the law perfectly, although such an achievement would be very difficult. Thus, as a general rule he asserted that all were sinners (p. 24). Whatever the resolution to this speculative problem is,

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Sanders remarks that one should not miss the main point: Paul does not say that it is impossible to obey the law in its entirety, and that since all mankind is guilty of sin, righteousness can only be granted by grace through faith (pp. 24-25).

Sanders does not examine Romans 7 until later in the book, and we cannot pursue in this article all the complex problems which arise in an analysis of this passage.⁶ We shall simply relate Romans 7 to the main issue which is under discussion, viz., what does Romans 7 say about human ability to obey the law? First of all Sanders notes that the chapter should not be latched onto as Paul's true view of why he rejected the law (p. 76). He rightly points out that any discussion of Romans 7 must be preceded by a clear understanding of the problem Paul is dealing with in the chapter. Paul is not asking why the law does not justify, nor is he investigating "the human condition to which God has responded by sending his son" (p. 76). Instead, Paul is exploring "the relationship between the law and sin" (p. 76). Paul's central concern here is theological and not existential or anthropological. Romans 7 does not describe an anthropological reality, but in the chapter Paul grapples with the theological problem of why God ever gave the law. Sanders claims that Romans 7 is unique in the Pauline corpus because here alone Paul says that mankind is simply unable to obey the law apart from Christ.⁷

Furthermore, Paul's explanation of the role of the law in God's plan in Romans 7 is not consistent with his thinking elsewhere. Paul's emotional anguish and tension probably explain the distinctive nature of this chapter (p. 79), for Paul must explain the acute theological problem of why God gave a law that could not save. Paul's "tortured explanations of the relationship between the law and sin" are due to his tension of trying to uphold both that salvation is apart from the law

6 6. Ibid., 70-81, esp. 76-81.

7 7. Even here Sanders does not say that it is impossible to obey the law; he merely says that Paul is claiming that one cannot obey the law *without Christ* (*Paul, the Law, and the Jewish People*, 78).

and yet God gave the very law which could not save (pp. 80-81). Thus, Sanders maintains that the only real consistency one finds in Romans 7 is Paul's conclusion, which is that all are saved by faith in Christ and not via the law (p. 81). To sum up, one should not use Paul's agonizing discussion in Romans 7 to discover his real view of the law, for the discussion of the law in this chapter was

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stimulated by an attempt to harmonize the negative function and the divine authorization of the law.

3. Galatians 5:3

Another verse which is traditionally used to defend the notion that no one can obey the law entirely is Gal 5:3. Paul is writing to the Galatians and warning them against submitting to circumcision. He says, "I testify again to every man who receives circumcision that he is bound to keep the whole law." Sanders, commenting on this verse, says: "He makes use of the fact that accepting circumcision implies accepting the whole law, however, not to argue that the law should not be accepted *because* all of it *cannot* be kept, but as a kind of threat; if you start it *must* all be kept" (p. 27).

Sanders goes on to say that the only way one can support the traditional view is to slip in some unwarranted assumptions into Paul's line of thought. The conventional thinking on the verse goes something like this (see p. 27):

- (1) One must keep the law perfectly.
- (2) No one can keep the law perfectly.
- (3) There is no forgiveness if one does not keep it perfectly.
- (4) Therefore, one is inevitably subject to a curse when one submits to the law.

Sanders argues that these four points are reasonable and logical, but no support can be found in Paul for points (1)-(3). Furthermore, this kind of thinking cannot be found in the Judaism of Paul's day (p. 27). Sanders emphasizes that there is absolutely no evidence in Judaism that one must obey the law perfectly. Moreover, one cannot support in Jewish literature the idea "that the law is too difficult to be fulfilled" (p. 28). Lastly, all of Judaism believed that when one did disobey the law that there was a means of atonement and forgiveness. Although the traditional understanding of Gal 5:3 is plausible, it is not supported by any solid evidence.

4. Romans 1:18-2:29

In order to understand Sanders' view on the fulfillability of the law, we must also examine his view of Rom 1:18–2:29, for oftentimes this section (and 3:9–20) is used to support the idea that no one can observe the law in its entirety. Sanders' basic response is that

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this passage cannot be used to defend the idea that no one can keep the law completely because Paul's statements in these chapters are inconsistent and contradictory. One of the reasons for the inconsistencies is that Paul is probably borrowing this material from Diaspora Judaism, incorporating it without integrating it with his own theology (p. 123).

Sanders also focuses on the central incongruity in these chapters. "The Gentiles are condemned universally and in sweeping terms in 1:18–32, while in 2:12–15, 26 Paul entertains the possibility that some will be saved by works" (pp. 123–24). He says that the reason scholars have had problems understanding this section is because they have assumed the validity of Paul's argumentation, but Sanders thinks that such an approach is flawed. Paul's rhetoric in Romans 1–2 is "internally inconsistent and it rests on gross exaggeration" (p. 125). For instance, it is incredible to believe that all Jews robbed temples (p. 125). Clearly, Paul's case for universal sinfulness is not an objective account of reality; instead, Paul wants to show that all are sinful "since universal sinfulness is necessary if Christ is to be the universal savior" (p. 125).

Sanders, of course, is aware of the traditional attempts to resolve the problems raised in Rom 1:18–32, but he maintains that none of the traditional resolutions is convincing. Käsemann, in particular, tries to rescue the chapter from contradiction by claiming that Paul's argument is hypothetical in 2:27 and that he is addressing Gentile Christians in 2:29.⁸ Sanders concludes that Käsemann's exegesis is helpful because it shows the contortions one must go through to read the chapter as a coherent whole (pp. 126ff). Käsemann appeals to the use of the word *pneuma* in 2:29 to show that Paul is addressing Gentile Christians, but Sanders says that, since the "spirit" in 2:29 is opposed to the "flesh" in 2:28, the human spirit is in view, not the Spirit of God. The true Jew is the one who keeps the law internally and is circumcised in heart. Such a statement on circumcision is not at all parallel to Phil 3:3 because in the latter passage the true Jews are those who "boast in Christ Jesus" (p. 127). In Romans 2 there is no mention of Christ, and the material on circumcision is typically Jewish (p. 131). Indeed, most scholars recognize that the material in 1:18–2:29 is pre-Pauline Jewish tradition (pp. 127–28).

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In addition, Sanders says that there is a marked divergence between what Paul says in chapter 2 of Romans and the conclusions he draws in Rom 3:9, 20. Rom 3:9 and 3:20 are usually seen as a condemnation of the universal sinfulness of

8 8. E. Käsemann, *Commentary on Romans* (Grand Rapids: Eerdmans, 1980) 72–77.

mankind. But, Sanders notes, the conclusion that all are sinful is certainly not apparent in chapter 2. Indeed, chapter 2 seems to imply that if one wanted to be a true Jew, then one must repent and obey the law with all one's heart (p. 129). This incongruity is probably explained by the theory that Paul borrowed a synagogue sermon and did not notice that the message of the sermon did not cohere harmoniously with what he says in Romans 3. The thrust of the sermon in Romans 2 is not that one should put one's faith in Christ because no one is able to obey the law; instead, the chapter seems to imply that one should truly obey the law and thus become a better Jew.

Sanders' view of Romans 2 raises the question of why Paul included the chapter at all. Sanders thinks that Paul wanted to show that both Jews and Gentiles are equal before God, and also parts of Rom 1:18–2:29 support Paul's conclusion in 3:9 (p. 131).

II. An Evaluation of Sanders' View

Introduction

Without a doubt Sanders' explanation of the role of the law in Pauline thought is stimulating and provocative. Indeed, his work is particularly thought-provoking because through a careful reexamination of the text he challenges a conventional understanding of the law which is rarely questioned or even discussed.⁹ A new interpretation forces us all to go back to the text to see if these things are so (cf. Acts 17:11). Sanders' view cannot be dismissed because it is untraditional or revolutionary, but it must be examined in light of the available evidence.

1. Galatians 3:10

Before examining Sanders' exegesis of Gal 3:10, we need to recall his analysis of the life-setting of Galatians. He emphasizes that the polemic in Galatians is not against Judaism but against Christian

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missionaries who argued that the law must be accepted as an entrance requirement. Sanders is surely correct in identifying the opponents as Christian missionaries, for a careful reading of Galatians reveals that Paul's rivals wanted to supplement devotion to Christ with obedience to the Torah (cf. Gal 1:6–7; 5:2–6). On the other hand, there is clearly some relationship between Paul's adversaries and Judaism. After all, the notion that circumcision was the required entrance rite stems from the OT (Gen 17:9–14).¹⁰ In addition, the idea that circumcision was

9 9. Cf. Dunn's comments in "New Perspective," 95–100.

10 10. E. DeW. Burton sums up the position of the adversaries aptly: "Their whole argument may very well have been based on the seventeenth chapter of Genesis, and if their premise that the Old Testament is of permanent authority be granted, there is no

the required entrance rite for proselytes was the commonly accepted view among Jews in NT times.¹¹

It seems, therefore, that Sanders draws a false contrast when he says that Paul's argument is not against Judaism, but against the idea that Gentiles must accept the law as an entrance requirement (p. 19), for the idea that circumcision must be submitted to as an initiation rite was *from* Judaism. It is true that Paul's critique is against Christian missionaries, but it is against Christian missionaries who have adopted *the Jewish view* that to be part of the covenant people one must be circumcised. Thus, when Paul attacks the view of the Christian missionaries, he is by definition critiquing the Jewish claim that circumcision must be adhered to as the entrance rite.¹²

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In a point that is similar to the one above, Sanders claims that Paul is not rebutting Judaism; instead, he is examining the question of "how one becomes a true son of Abraham, that is, enters the people of God" (p. 19). Again one can agree with Sanders that Paul is not addressing his argument to Jews who deny the Messianic status of Jesus; he is opposing Christian missionaries. But Sanders draws a false dichotomy when he says that the argument is not *contra* Judaism but relates instead to how one becomes a son of Abraham. The notion that one had to be circumcised to be a son of Abraham was a Jewish view (cf. Gen 17:9–14; *Jub* 15:26–30), not a Gentile one. So, when Paul claims that one does not have to be circumcised to be Abraham's heir (Gal 3:23–29; cf. Gal 5:2–6), he is clearly rejecting a view that was commonly accepted by Jews in Paul's day.

escape from their conclusion" ("Those Trouble-Makers in Galatia," *Biblical World* 53 [1919] 57).

11 N. J. McEleney maintains that circumcision was required as an initiation rite by the Pharisees, but in the Diaspora the situation was much more fluid and circumcision was sometimes waived. ("Conversion, Circumcision, and the Law," *NTS* 20 [1974] 319–41; cf. also K. J. Kuhn, "Prosēlutos," *TDNT* 6.742; P. Borgen, "Observations on the Theme 'Paul and Philo.' Paul's Preaching of Circumcision in Galatia (Gal. 5:11) and Debates on Circumcision in Philo," *The Pauline Literature and Theology* [ed. S. Pedersen; Göttingen: Vandenhoeck & Ruprecht, 1980] 87–88). J. Nolland, however, has subjected McEleney's evidence to critical scrutiny and has convincingly demonstrated that the available evidence does not suggest that circumcision was an optional rite for proselytes in the Diaspora ("Uncircumcised Proselytes?" *JSJ* 12 [1981] 173–94).

12 Sanders gives a full note on the identity of Paul's opponents. He is in basic agreement with the traditional view of Paul's opponents, although he does not identify them precisely (*Paul, the Law, and the Jewish People*, 48–49, n. 6). F. F. Bruce is probably right in subscribing to the usual view that the adversaries were Judaizers, i.e., Christian Jews who wanted the Galatians to obey the OT law ("Galatian Problems 3: The 'Other' Gospel," *BJRL* 53 (1970) 253–271).

Sanders goes on to say that the theory that Paul was opposing Judaism stems partly from the mistaken notion that the Judaism of Paul's day believed that good deeds could merit salvation (pp. 19-20). What Paul's opponents believed, however, was not that obedience to the law was meritorious, but that adherence to the law was "the *condition* of salvation" (p. 51, n. 16). Sanders may be correct that the Jews of Paul's day would not have viewed such a conditional acceptance of the law for salvation as meritorious, but one can also understand why Paul might have concluded that such a view of the law implied that salvation is by human merit.¹³ For if obedience to the law is a necessary *condition* of salvation, then it follows logically that one cannot be saved unless one observes the law. But if one cannot be saved unless one keeps the law, then salvation is due, in part, to human attainment. But if salvation is partially due to human attainment, then one could justly say that his or her obedience to the law earned or merited, at least partially, salvation.¹⁴ An example from today's world should help clarify what is being said. If a grade of 95% is the condition for receiving an A, then it follows that one must attain a 95% to acquire an A. But anyone who attains 95% would rightly say that the grade of A was merited. The example

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given above should not be taken too far. Those who said that the law was a condition of salvation may have claimed that salvation was due both to grace and obedience to the law. But Paul may have responded that any such syncretism was a distortion and exclusion of grace (Rom 11:5-6). Once again, then, Sanders' claim that in Galatians Paul's critique was not directed against Judaism is not altogether convincing. Nevertheless, the validity of Sanders' view does not stand or fall on his analysis of the life-setting, and thus an examination of his exegesis is necessary.

Sanders, as we have seen, gives three reasons to support the idea that in Gal 3:10 Paul is not saying that it is impossible to observe the law. In a sense all three of the arguments which are put forth by Sanders are one and the same argument, viz., he contends that the OT citations which Paul uses in Galatians 3 are proof-texts. Paul is not really using OT texts which logically support his argument; instead, he is simply looking for *terms* or *citations* in the OT which will buttress his main proposition that Gentiles should be saved by faith.

In Gal 3:10, according to Sanders, Paul cites Deut 27:26 because it contains the terms "law" and "curse," and not because the verse contains the word "all." Clearly, Paul selects OT texts because they contain terms which are relevant to the subject at hand, but the selection of texts with such terms does not prove that

13 13. We cannot discuss in detail here whether or not this was, in fact, Paul's view of Judaism.

14 14. *The Oxford English Dictionary* defines merit as "that which is deserved or has been earned, whether good or evil, due reward or punishment" (Oxford: Clarendon, 1933) 6:358.

only the relevant terms are exegetically significant in the OT citation. Such an argument assumes in advance what needs to be proved. For instance, it is presupposed that the word “all” in Gal 3:10 is not important to Paul’s argument, but it is precisely this latter point which needs to be proved.¹⁵

Of course, Sanders attempts to substantiate the above assertion, declaring that the key to understanding a proof-text in Paul is by focusing on Paul’s explanation of the proof-text. In the past,

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according to Sanders, scholars have made the mistake of trying to interpret the meaning of the proof-text. Methodologically, this is undoubtedly the most important argument for Sanders’ position. However, he does not defend this principle with any substantial evidence but simply asserts its validity. There is clearly some truth in what he is saying, for Paul is using OT citations to prove his thesis that Gentiles are justified by faith. And it also makes sense that there would be a close relationship between the OT citation and Paul’s comment on that citation. But Sanders’ contention that the OT citation should only be interpreted in terms of Paul’s commentary upon it is hard to support as a universal principle. The use of the OT in the NT is too complex to be straitjacketed in this manner.¹⁶ One must investigate the context and line of argument to see how the OT is being used in any given passage.

What has been said above does not rule out Sanders’ interpretation of Gal 3:10, for it is possible that in this case one should locate the meaning solely in Paul’s comment on Deut 27:26. However, such an exegesis of Gal 3:10 is not convincing because all of Paul’s OT citations in 3:10–13 clarify and bolster his argument by providing a reason for Paul’s introductory statement. A brief survey of Gal 3:10–14 should help explain what is being said here. In v 10 Paul says that all who are of the works of the law are under a curse. The OT citation from Deut 27:26 in v 10 *explains why* this is the case: anyone who does not keep the entire

15 15. It is possible that Paul used an LXX text which contained the word “all” rather than the MT because the latter does not have the word “all.” H. D. Betz notes that the quotation “does not fully correspond to the LXX or the MT.” He speculates that Paul may have quoted from an LXX text which is unknown to us or he may have quoted on the verse from memory (*A Commentary on Paul’s Letter to the Churches in Galatia* [Hermeneia; Philadelphia: Fortress, 1979] 145). E. E. Ellis surveys the whole question of which text Paul used when quoting the OT. Such a survey shows how complex and intricate this issue is (*Paul’s Use of the Old Testament* [Grand Rapids: Baker, 1981–1957] 10–20).

16 16. See C. H. Dodd, *According to the Scriptures: The Sub-structure of New Testament Theology* (London: Nisbet, 1952); Ellis, *Paul’s Use of the Old Testament*; A. T. Hanson, *Studies in Paul’s Technique and Theology* (London: S.P.C.K., 1974); R. Longenecker, *Biblical Exegesis in the Apostolic Period* (Grand Rapids: Eerdmans, 1975).

law is under a curse. The obvious implication of Paul's statement is that no one keeps the law perfectly, and therefore all are under a curse.¹⁷

In verse 11 Paul makes another assertion—he says it is clear that no one can be justified by the law. The OT citation from Hab 2:4 again *explains why* Paul's statement is true: no one can be justified by the law because justification is only by faith.¹⁸ Some may have

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objected to Paul's argument by saying that law and faith are not incompatible. Paul anticipates this objection in v 12 and claims that the law (by "law" here he means the "works of the law")¹⁹ cannot be combined with faith. He cites Lev 18:5 to *support* his contention. The one who performs the law will not live by faith but by his performance of the law. The thought of v 10 is also implied in v 12. Since no one can obey the law, it is futile and vain to try to obtain life by living under the law.²⁰

In v 13 the logical argument continues. If every person is cursed because no one can keep the law (v 10), then no one can inherit the blessing of Abraham. Paul explains the way out of this dilemma in v 13. Christ has liberated believers from the curse of the law by becoming a curse for us. The OT proof-text from Deut 21:23 *explains how* Christ became a curse for us: he became a curse by hanging on a tree.²¹ Paul sums up and concludes his argument in v 14. Since Jesus by dying on the cross removed the curse of the law, the blessing of Abraham is now available to the Gentiles by faith.

17 17. In the article listed under n. 3 I provide a more detailed defense for this interpretation of Gal 3:10.

18 18. F. F. Bruce says that 3:11 proves that justification is by faith even if one is able to keep the law (*The Epistle to the Galatians: A Commentary on the Greek Text* (NIGTC; Grand Rapids: Eerdmans, 1982) 161; cf. Sanders, *Paul, the Law, and the Jewish People*, 23).

19 19. Cf. D. P. Fuller, "Paul and the Works of the Law," WTJ 38 (1975) 40; Bruce, *Galatians*, 161.

20 20. Cf. Wilckens, "Aus Werken des Gesetzes," 92; Betz, *Commentary to Galatia*, 147; J. B. Lightfoot, *The Epistle of St Paul to the Galatians* (reprint from 1890 ed.; Grand Rapids: Zondervan, 1957) 139; E. DeW. Burton, *A Critical and Exegetical Commentary on the Epistle to the Galatians* (ICC; Edinburgh: T. & T. Clark, 1920) 167.

21 21. See F. F. Bruce, "The Curse of the Law," *Paul and Paulinism: Essays in Honour of C K Barrett* (eds. M. D. Hooker and S. G. Wilson; London: S.P.C.K., 1982) 27–36. Hooker argues that the conception in Paul's mind is one of interchange not substitution. Morris thinks that substitution is in view. (M. D. Hooker, "Interchange in Christ," *JTS* 22 [1971] 349–61; L. Morris, *The Apostolic Teaching of the Cross* [Grand Rapids: Eerdmans, 1965] 55–59).

A survey of the OT citations in Gal 3:10–13 shows that each citation does advance Paul’s argument; each citation explains or provides the rationale for Paul’s introductory comment. If one deleted all of the OT proof-texts and merely retained Paul’s introductory statements, the cogency and logic of his case would be immeasurably weakened. An analysis of Gal 3:10–13, then, does not support Sanders’ theory that one should focus only on Paul’s introductory comments and not on the OT proof-texts.

Sanders’ last argument is that in Gal 3:8–14 the key verses are 3:8 and 3:14 , and vv 10–13 are subordinate to these texts. Sanders rightly sees the significance of 3:8 and 3:14 in Paul’s argument, but the

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subordination of vv 10–13 does not conclusively prove Sanders’ idea that these verses have nothing to say on the fulfillability of the law. 3:10–13 may be subordinate and still play an important logical role in the overall development of Paul’s line of thought. Indeed, strong subordinate points are absolutely necessary if one wants to demonstrate the credibility of one’s conclusion. Thus, the contention that 3:10–13 is subordinate does not prove the conclusion that these verses say nothing about the possibility of fulfilling the law completely.

Sanders’ view of the OT citations in Galatians 3 fits with his understanding of the chapter (and Pauline theology) as a whole. Paul is not giving *reasons* to defend his position; instead, he is merely using exegetical arguments to validate a dogmatic position he already holds. Paul is arguing from solution to plight, i.e., since Christ is the solution, salvation by law is by definition excluded. We cannot examine in detail here the solution to plight theory of Sanders,²² but it is improbable that such a conception of Paul’s view of redemption is sufficiently broad. If Sanders were correct and Paul is merely using exegetical arguments which buttress his presuppositions, one wonders *how* Paul could have ever hoped to convince the Galatians of the validity of his position.²³ The Judaizers, after all, would have also argued that salvation was through Christ and the observance of the law. If Sanders is right Paul’s reply to this seems to be: “No, salvation is through Christ alone, and *therefore* the law is excluded.” But what Paul fails to

22 22. See E. P. Sanders, *Paul and Palestinian Judaism: A Comparison of Patterns of Religions* (London: SCM, 1977) 474–511.

23 23. J. C. Beker says that Sanders’ analysis does not explain *why* Paul rejected his pharisaic past so radically nor does it explain why Paul’s stance on the law was different from his Jewish kinsmen (*Paul the Apostle: The Triumph of God in Life and Thought* [Philadelphia: Fortress, 1980] 237–38). R. H. Gundry in a paper presented at the meeting of the Society of Biblical Literature in December 1981 emphasized that Paul’s rejection of the law probably stemmed from both his theology and his existential experience (see now his article “Grace, Works, and Staying Saved in Paul,” *Bib* 66 [1985] 1–38). J. D. G. Dunn (“New Perspective,” 102) points out that Sanders’ explanation of why Paul rejected the law is bewildering. Why does Paul reject the law in such a capricious way?

explain, if one follows Sanders' interpretation, is *why* the law is excluded as a way of salvation. It seems that Paul is merely dogmatically asserting the correctness of his position. Of course, it is theoretically possible that Paul was a very poor debater, and all

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he did (like many a debater today) was to assert very loudly the accuracy of his point of view. But most commentators have agreed that Paul's rhetoric was more logical than this.²⁴

Furthermore, his letter was probably preserved because the Galatian church saw the coherency and cogency of his point of view. It seems clear that the Galatian opponents, on first blush, had stronger scriptural support (Gen 17:9–14), and to counter the view of his adversaries successfully Paul had to argue his case from the Scriptures in a logical and compelling way. We can fairly conclude, then, that Paul would have had to use reasonable and logical arguments to defend his position in Galatians. Such a perspective on Paul's use of the OT fits with the exegesis we gave above of Gal 3:10–13. It would be appropriate here to demonstrate in more detail that in Gal 3:10 Paul does claim that it is impossible to fulfill the entire law, but this verse has been examined in another article.²⁵ It is sufficient to conclude this section by noting that none of Sanders' arguments, which attempt to overturn the traditional idea that Gal 3:10 teaches that it is impossible to fulfill the law entirely, is successful.

2. Other Major Pauline Texts

Sanders acknowledges that in Rom 5:12 Paul maintains that mankind is universally sinful, but he points out that in Phil 3:6 Paul claims that in his pre-Christian days he was blameless in law-righteousness. Thus, there seems to be a logical conflict concerning the statements made in the two verses cited above, and Sanders discusses some tentative approaches to this dilemma.

In our opinion, however, there is ultimately no dilemma because Paul is not saying in Phil 3:6 that he was sinless, for the word blameless (*amemptos*) should not be equated with sinlessness. When Luke says that Elizabeth and Zechariah were "blameless" (Luke 1:6) in their performance of the law, he probably does not mean that they were absolutely sinless. Zechariah's skeptical response to the message of Gabriel was presumably not the first time he sinned

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24 24. For example, even if H. D. Betz's analysis of the rhetorical structure of Galatians is not accepted *in toto*, his study does suggest that Galatians was a carefully written piece of literature ("The Literary Composition and Function of Paul's Letter to the Galatians," *NTS* 21 [1975] 353–79).

25 25. See my article which is listed under n. 3.

(Luke 1:18–20). Paul’s assertion of blamelessness in Phil 3:6 probably presupposes that he offered sacrifices when he sinned. By offering a sacrifice when he had fallen short Paul could remain blameless, and yet the very offering of a sin or guilt offering is an acknowledgment of sin. Thus, in Phil 3:6 it is unlikely that Paul is claiming perfect sinlessness; instead, he is saying his devotion to, and observance of, the law were extraordinary.

It is possible that the above explanation of Phil 3:6 is incorrect, but even if this is the case, the idea that Paul is claiming perfect sinlessness in this verse is still implausible. Verse 6 must be read in the light of the entire context of Phil 3:2–11. Paul is attacking Jewish adversaries in this section, showing that he is far better than they in both pedigree and performance of the Torah. He is appealing to his own experience here because he has already tried the route which the Judaizers are recommending, and he knows how futile it is to attempt to establish his own righteousness. Thus, when Paul claims to be blameless in his observance of the law, he is reflecting on his past, and futile, confidence in the flesh (Phil 3:3–4). Indeed, Phil 3:3 shows that in Paul’s mind there was an inevitable link between putting confidence in the flesh and boasting.²⁶ Now that Paul has encountered

26 Sanders objects to this interpretation of Philippians 3. He does not think Paul criticizes boasting because boasting is itself wrong; instead, Paul is against such boasting simply because he believes that one should only put confidence in Jesus Christ. In other words, Paul’s concern is with the object of boasting, not the fact of boasting (*Paul, the Law, and the Jewish People*, 44). In a sense what Sanders says here is correct. Paul does think one should boast in God (Rom 5:11), and so he is not critical of boasting *per se*. But Sanders, in his negative reaction to Bultmann’s existential interpretation of Paul, has gone to the other extreme. He denies that there is any existential or anthropological element in the formation of Paul’s theology (except that Paul’s view that salvation was by Christ alone caused him to reject all other ways of salvation), affirming that Paul’s reasoning is solely and completely theological. Paul is not criticizing self-righteousness but merely the idea that some do not put their confidence in Christ. Paul’s concern is not that some people are self-righteous or legalistic; his only concern is that some people do not believe in Christ. Sanders’ thesis is questionable because Paul’s language in Phil 3:2–11 is theological and existential. Certainly Phil 3:2–11 is one of the most existential and experiential passages in Paul’s writings. For example, note Paul’s use of the word *ginōskō* in 3:7–11 (cf. J. T. Forestell, “Christian Perfection and Gnosis in Phil 3:7–16,” *CBQ* 18 (1956) 123–36). This is certainly not a call for an uncritical acceptance of Bultmann’s views on Paul. But Bultmann’s anthropological analysis of Paul is strong precisely where Sanders is weak, for the former perceives the existential and experiential side of Pauline thought. On the other hand, Paul’s rejection of Judaism in Sanders’ scheme is existentially inexplicable. Paul simply rejects Judaism because it is not Christianity. Sanders’ observation on boasting, as we have already pointed out, is partially correct. Paul is not against boasting *per se*, he encourages boasting in God and Christ. But does Paul discourage boasting in one’s own performance of the Torah only because the Torah is the wrong object of confidence? It is precisely at this point that Sanders fails to see the existential element of Paul’s thinking. Paul discouraged boasting

Jesus Christ he renounces all his past accomplishments, for they were a way of parading Paul's own righteousness, a means of boasting, and pegs for his self-confidence.²⁷ His experience with Christ brought him to the realization that his own righteousness under the law was "refuse" (skubala, 3:8).²⁸ To conclude, what we have in Phil 3:6 is Paul's pre-Christian evaluation of himself. As a Pharisee Paul may have thought that he kept the law flawlessly (although even then this probably included offering sacrifices in the temple for his sins), but this was a preconversion view of himself which his encounter with Christ transformed. After Paul came to know Christ he realized that his so-called righteousness under the law was a false righteousness, an illusory righteousness.²⁹ If our interpretation of Phil 3:6 is correct, there is no conflict between what Paul says in Rom 5:12 and Phil 3:6, for Paul is not asserting that he kept the law perfectly in the latter verse.

Paul also says in Rom 3:23, according to Sanders, that mankind is universally sinful. Indeed, Rom 3:23–26 might even be read in such a way that Paul is saying that "since everybody sins, therefore righteousness is by grace, through faith" (p. 24). Nevertheless, Sanders claims that the above interpretation is not certain, and in any case the verse probably contains pre-Pauline tradition, and therefore it cannot be used to establish Paul's view of the law. Sanders' last point is not convincing. Even if Rom 3:23 is pre-Pauline tradition, the ideas contained in the tradition become Paul's own when he adopts and adapts them for his own use. Presumably Paul draws on traditions because he is in agreement with what the traditions say, or he shapes the traditions so that they are in harmony with his thought.

in the works of the law because this inevitably led to a pride in one's own *self*, in one's own devotion to, and performance of, the law. To boast in Christ or God, however, is not to boast in one's own accomplishments; one merely exults in what God in Christ has done. We need to remember that Paul's critique of Torah-centered righteousness is not supercilious, for Phil 3:2–11 clearly shows that Paul is criticizing his own life and past also. For a view that is quite similar to Sanders' position see H. Räisänen, "Legalism and Salvation by the Law: Paul's Portrayal of the Jewish Religion as a Historical and Theological Problem," *The Pauline Literature and Theology* (ed. S. Pedersen; Göttingen: Vandenhoeck & Ruprecht, 1980) 68–72. For R. Bultmann's view see *Theology of the New Testament* (New York: Scribner's 1951) 1.259–69.

27 27. H. R. Moehring is incorrect when he suggests that the qualifications that Paul lists in Phil 3:5–6 are inherently evil because one will inevitably begin to trust in one's own accomplishments. Nevertheless, he does adequately explain the inherent danger of law-oriented religion ("Some Remarks on *Sarx* in Philippians 3:3ff," *Studia Evangelica* [ed. F. L. Cross; Berlin: Akademie, 1968] 4.432–436; cf. E. Schweizer, "*Sarx*," *TDNT* 7.130).

28 28. Cf. F. Lang, "Skubalon," *TDNT* 7.445–47.

29 29. Cf. here C. E. B. Cranfield, *A Critical and Exegetical Commentary on the Epistle to the Romans* (ICC; Edinburgh: T. & T. Clark, 1979) 2.847.

A brief analysis of Romans 3 reveals that Paul is saying that righteousness is not available by law because all have sinned; therefore, righteousness is available by grace for those who put their faith in Christ. In 3:21 when Paul says that “the righteousness of God has been manifested apart from law,” the context makes it evident that righteousness is available apart from the works of the law (cf. Rom 3:20). Rom 3:19–20 shows what Paul means by the works of the law. No human being can open his mouth in self-defense before God because of his obedience to the law. Instead, each mouth is closed before God because no one keeps the law flawlessly, for “through the law comes the knowledge of sin” (Rom 3:20).³⁰

Dunn differs both from Sanders and the interpretation presented above because of his interpretation of the phrase “works of the law.”³¹ Paul’s assertion that justification is not by works of law is not a rejection of keeping the law nor is Paul disparaging the notion of works or activity. When Paul refers to works of law in Galatians he has in mind particular observances, such as circumcision and food taboos, which separate Jews from Gentiles. These particular laws that Paul had in mind, according to Dunn, were the “identity-makers” and “badges” of Jewish nationalism. Paul is not criticizing works of law because anyone is trying to earn God’s favor or boasting in self-achievement.³² What Paul objects to are *particular* works of law, like

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circumcision, which separate the Jews from Gentiles. Dunn says that what Paul “is concerned to exclude is the *racial* not the ritual expression of faith; it is *nationalism* which he denies not *activism*.”³³

Paul, then, criticizes the adoption of circumcision because submission to circumcision created a breach between Jews and Gentiles, not because circumcision was a *work*. Sanders has made the mistake, according to Dunn, of thinking that Paul is speaking against the law because he has failed to distinguish between law and works of law. The works of law are only particular Jewish observances which are nationalistic and racial in character.

While it cannot be denied that Dunn’s analysis of works of law contains elements of truth, particularly his point that Paul was concerned about the unity of

30 30. Ibid., 1.199.

31 31. Dunn, “New Perspective,” 106–20.

32 32. J. B. Tyson, following E. Lohmeyer, thinks that the real problem with works of law is the reason or motive which lies behind such law observance (J. B. Tyson, “‘Works of Law’ in Galatians,” *JBL* 92 [1973] 423–31; E. Lohmeyer, “Gesetzeswerke,” *Probleme paulinischer Theologie* [Stuttgart: Kohlhammer, n.d.] 33–73). Fuller emphasizes that works of the law refers to the legalistic observance of the law (“Works of the Law,” 28–42; cf. C. H. Cosgrove, “The Mosaic Law Teaches Faith: A Study in Galatians 3,” *WTJ* 41 [1978-1979] 146–64).

33 33. Dunn, “New Perspective,” 115.

Jews and Gentiles, his exegesis is not satisfying. It is entirely possible that Paul's opponents in Galatia were only attempting to persuade the Galatians to subscribe to specific parts of the law, such as circumcision.³⁴ Nevertheless, Paul certainly did not limit works of law to particular parts of the law, for he was convinced that the Galatians wanted to be under the law (Gal 4:21). Paul does not say in 4:21 that they wanted to be under part of the law, but "under law" as a whole. John Drane rightly says: "But 4:21, both grammatically and logically seems to prove beyond the slightest possibility of doubt that the Galatian heretics were promoting the observance of the Law as well as circumcision."³⁵

Furthermore, in Gal 5:3 Paul explains why he is opposed to the adoption of circumcision. He does not say here, although it may be one of his reasons elsewhere, that an acceptance of the rite erects a barrier between Jews and Gentiles. He says that such a move compels one to observe the entire law. Paul is not against circumcision merely because it was a nationalistic rite of the Jews; he was against it because the acceptance of circumcision also obligated one to obey the rest of the law. Apparently Paul thinks it is impossible to separate

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circumcision from the rest of the law, but this is precisely what is necessary for Dunn's definition of works of law to be credible because the latter thinks works of law refers to particular nationalistic Jewish rites and not the law as a whole.

Gal 5:3 shows, however, that this is a false dichotomy because the law was a single fabric for Paul, and the acceptance of part of the law necessarily and logically implied that one had to obey the rest of the law as well. That this is Paul's view is clear from Gal 5:4 also. Circumcision is a badge as Dunn says, but it is the badge of those who want to be justified by the law as a whole (cf. Gal 5:4). Gal 5:6 makes it evident that Paul is not anticircumcision; he thinks the rite is insignificant and irrelevant in itself. The reason Paul is against circumcision in Galatians is because the badge of circumcision *represents* the idea that one can be justified by law (Gal 5:4), and such a stance cuts one off from Christ. Ultimately, it is impossible to separate justification by "works" and justification by "works of law" in Paul.³⁶ When Paul says no one can be justified by works, he means that "no man will earn justification by his obedience to God's requirements. The reason why this is so is that erga nomou in the sense of such a perfect obedience as would merit justification are not forthcoming."³⁷

34 34. This writer has doubts about the validity of even this understanding of the opponents.

35 35. J. W. Drane, *Paul, Libertine or Legalist? A Study in the Theology of the Major Pauline Epistles* (London: S.P.C.K. 1975) 47.

36 36. Moo, "Law, 'Works of the Law,' and Legalism in Paul," 96. Moo's entire discussion on works of the law in Paul is very valuable (pp. 90-99).

37 37. Cranfield, *Romans*, 1.198.

Such an interpretation of works of law is consistent with Rom 3:9–18 where Paul argues that all are under sin, that no one is righteous, and that all have turned aside.³⁸ And it is also consistent with what Paul says in Romans 7: the person who is under the law cannot keep it. Paul sums up this point in Rom 3:23 where he says, “all have sinned and fall short of the glory of God.” So when Paul says in 3:20–21 that justification cannot come by the law, it is abundantly clear in the context that this is so because no one can keep the law. The rest of Rom 3:21–26 unveils the true source of righteousness. Righteousness is now open to all mankind through the death of Jesus Christ on the cross. The grace of God provided this way of redemption, and it is available to all by faith. To sum up, Paul seems to be saying very lucidly in 3:9–26 that righteousness cannot be based upon the law because all are sinful and no one can keep it. But now through Jesus Christ’s death on the cross righteousness is

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available by grace through faith. Sanders’ contention, then, that Paul does not use the argument that it is impossible to obey the law because righteousness is by faith, is fallacious.

The role of Romans 7 in Paul’s view of the law is also significant. Obviously we cannot treat such a complex and interesting chapter in detail here, but we should relate it to the specific issue under discussion, viz., what does Romans 7 say about mankind’s ability to obey the law? Sanders concedes that in Romans 7 Paul is saying that no one can obey the law, but he insists that Paul’s reflections in the chapter should not be used to reconstruct Paul’s true view of the law. After all, Paul’s reasoning in this chapter is tortured and anguished.

Whether or not Paul believed that one in *Christ* could obey the law perfectly is not the topic of this article, but we can agree with Sanders that Paul is, at the very least, saying in Romans 7 that the person apart from Christ cannot obey the law, for the latter statement is the thesis of this article. Sanders, however, protests that Paul’s view in Romans 7 cannot be accepted as his true view of the law because his reasoning is tortured due to the theological problem with which he was confronted. However, Paul’s point of view will only seem tortured to those who think that elsewhere in his writings he says that the law is fulfillable. To this writer Paul’s conclusions in Romans 7 about the possibility of fulfilling the law are entirely consistent with what he says elsewhere. Thus, Romans 7 raises problems for Sanders that are not raised for those who believe that Paul consistently argued that no one could be justified by the law because no one is able to keep it flawlessly.

3. Galatians 5:3

38 38. Ibid., 1.194.

Whether or not Paul is saying in Gal 5:3 that it is impossible to obey the law entirely is not immediately clear. Sanders, as we have seen, says that Paul is threatening the Galatians, not saying that perfect obedience is unattainable. Nevertheless, we shall attempt to show that Paul is implying that it is impossible to keep all the law in Gal 5:3.

Sanders maintains that Paul cannot be saying that one must keep all the law, that no one can keep all of it, and there is no forgiveness if one does not keep all of it. After all, there is no evidence in Judaism that anyone held views like these.

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No one would claim, however, that all of Paul's views can be paralleled in Jewish literature. Some of his conceptions are undoubtedly the result of his encounter with Christ on the Damascus road.³⁹ Whether or not Paul's thought is parallel with Judaism, therefore, is not the only, or even the decisive, criterion for the origin of his theology; one must examine what Paul actually says in any given passage.⁴⁰ Sanders lists four points which must be true for Paul to be teaching that it is impossible to keep the law perfectly (see p. 251 above). It seems that points (1), (2), and (4) are implied in Gal 3:10 but the most controversial point is (3). How could Paul say that there was no forgiveness if one did not keep the law perfectly when the OT cultic system provided a means of atonement?⁴¹ It is precisely here that the disjunction between Paul and Judaism becomes evident, for in Gal 3:13 Paul claims that the removal of the curse of the law is only actualized through Jesus' death on the cross. The difference between Paul and Judaism, i.e., the newness of Paul's gospel was never more evident than in Paul's conception of atonement. Apparently Paul no longer believed that forgiveness was granted through the OT cultus; now forgiveness, or liberation from the curse of the law, was available only by virtue of the death of Christ.

The discussion of Gal 5:3 to this point does not demonstrate that the verse implies that it is impossible to obey the law completely. We have merely examined some objections which are used to contest the idea that this is what Paul *could* be saying. But what does Paul mean when he says that one who accepts

39 Cf. S. Kim, *The Origin of Paul's Gospel* (WUNT 2/4; Tübingen: J. C. B. Mohr, 1981). Kim sees Paul's conversion as decisive for the formation of his theology. One can certainly agree that Paul's encounter with Christ on the Damascus road was the beginning of a radical reevaluation of his past life and theology.

40 We do not deny, however, that Paul was significantly influenced by his Jewish roots. He did not overthrow all of his Jewish past. The entire question is extremely complex because Paul's thinking reflects both continuity and discontinuity with Judaism. For Paul's relationship to rabbinic teaching see W. D. Davies, *Paul and Rabbinic Judaism: Some Rabbinic Effects in Pauline Theology* (4th ed.; Philadelphia: Fortress, 1980).

41 G. Howard makes this same point as well (*Crisis in Galatia: A Study in Early Christian Theology* [SNTSMS 35; Cambridge: Cambridge University Press, 1979] 53).

circumcision “is bound to keep the whole law”? Sanders thinks Paul is simply threatening the

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Galatians because it would be burdensome to obey the *entire* law.⁴² Such an interpretation is possible, but there is no evidence that the Galatians thought it would be a burden to be obligated to obey the whole law. Instead, Paul can characterize them as people “who desire to be under law” (Gal 4:21) and who want to “be justified by the law” (Gal 5:4). If Paul were threatening them with the responsibility to obey the entire law, then they would probably have responded: “That is precisely what we will do.” But Paul’s argument makes more sense if he is saying that it is impossible to obey the entire law, and therefore the acceptance of circumcision is futile. The desire to be justified by law is vain because no one can keep it perfectly. This may explain Paul in 5:3, for Paul may be reminding the readers of his statement in 3:10 or his oral preaching.⁴³

4. Romans 1:18-2:29

Rom 1:18–3:20 has often been used to show that perfect obedience to the law is unattainable, but Sanders says that 1:18–2:29 only shows that Paul condemns heinous sins; it does not show that all are sinful. Furthermore, Paul’s statements in this passage are incoherent and contradictory, for Paul thinks it is a live possibility that Gentiles do obey the law perfectly.⁴⁴ This last problem is the most crucial, and we will discuss it more fully below. But we must deal with a minor objection first.

Sanders claims that Paul’s argument is grossly exaggerated because he accuses all Jews, for example, of robbing temples (Rom 2:22).⁴⁵ Such an interpretation is not really accurate. Nowhere does Paul say that *all* Jews rob temples. Paul’s argument in 2:17–24 can be trivialized by reading it too woodenly. His point is that even though the Jews possess, know, teach, and love the law, they are guilty of hypocrisy because they do not keep it. Paul gives specific examples of

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such hypocrisy in 2:21–22, but it is certainly not necessary to conclude that all Jews were guilty of the specific points Paul mentions. What Paul is interested in is

42 42. Howard (*Crisis in Galatia*, 16) and Bruce (*Galatians*, 231) also do not think that Paul is referring to the impossibility of obeying the law in 5:3. Rather, Paul was simply arguing that life under the law was a life of bondage.

43 43. Cf. Betz, *Commentary to Galatia*, 260-61. Lightfoot (*Galatians*, 203) thinks 5:3 is a restatement of Gal 5:2.

44 44. H. Räisänen is in full agreement with Sanders on this point (*Paul and the Law* [WUNT 29; Tübingen: J. C. B. Mohr, 1983] 101–9; “Theological Difficulties,” 309).

45 45. Again see Räisänen who makes the same point (“Theological Difficulties,” 309).

the *principle*, viz., that all Jews are guilty of violating the very law they treasure and teach. To be sure, Paul uses examples that are rhetorically colorful and particularly despicable, but he does this (like any good preacher) to underline his main point, viz., that the Jews, like the Gentiles (1:18–32), were inconsistent because they did not practice what they preached. The notion that even the most moral people of the ancient world were hypocritical is neither an exaggeration nor an expression of hostility, but it is a profound comment on the nature of the human condition. There is a terrible contradiction in the very heart of humanity, for even the people who deeply believe in moral values find themselves violating the very values which they uphold philosophically with such fervor and devotion.

Nevertheless, the central problem of chapter 2 is that Paul seems to be saying that Gentiles can obey the law. Our discussion of this problem will center on Rom 2:25–29, for this text is representative of the problem which is found in Romans 2. Clearly the text is a difficult one, but despite Sanders' objections we think Paul is thinking of the obedience of Gentile Christians in this passage.

Some scholars maintain that Paul is speaking hypothetically when he refers to Gentiles obeying the law because (1) The entire argument from 1:18–3:20 is designed to show that no one is righteous, that no one keeps the law, and that all are guilty before God. It would be inconsistent, according to this view, to claim that the Gentiles observe the law in the midst of an argument where he is seeking to prove that no one fulfills the law.⁴⁶ (2) Käsemann, at one point, says that it is improbable that Paul would say that the Jew could not keep the law and then argue that the Gentile does.⁴⁷

But the first objection is only convincing if Paul is speaking about perfect obedience to the law, an obedience which merits justification. However, Paul is probably not referring to perfect obedience to the law in v 26; he is thinking of obedience to the law which is the result

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of faith.⁴⁸ This obedience to the law which springs from faith is not perfect or complete, but it is the result of the Holy Spirit working in one's life (cf. Rom 2:28–29).⁴⁹

46 46. C. A. Hodge, *A Commentary on Romans* (London: Banner of Truth, 1972–1864) 64; cf. J. Calvin, *The Epistla of Paul to the Romans and the Thessalonians* (Grand Rapids: Eerdmans, 1960) 56.

47 47. Käsemann, *Romans*, 73.

48 48. What Paul says in Rom 2:7–10, 13 may seem to contradict what is being said here, for 2:13 clearly indicates that those who obey the law will be justified. But there is only a contradiction if Paul is claiming that some can obey the law *perfectly* and thereby be justified. Instead, Paul is probably speaking of an obedience to the law which is the result of faith. This obedience is not perfect, but it is an indication that faith is genuine (cf. Jas 2:14–26). See Cranfield, *Romans*, 1.151–53 for a defense of this interpretation. N. M.

The above interpretation also answers Käsemann's objection. Paul's point is not that the Jew cannot keep the law perfectly (v 25), but the Gentile is able to keep it entirely. This would obviously make Paul's argument completely illogical. Paul is referring to two different kinds of people in 2:25–26. In verse 25 he addresses the unbelieving Jews and says they cannot be justified unless their observance of the law is flawless. But in v 26 he maintains that believing Gentiles, even though they are not circumcised, may experience the circumcision

Watson in a recent article discusses the relationship between "justification by faith" and "judgment according to works" in Paul, maintaining that the situation Paul addressed determined whether he emphasized justification by faith or judgment according to works. Watson does not attempt to solve the logical antinomy between the two themes in his article, but he does show that both themes are authentically Pauline ("Justified by Faith; Judged by Works—an Antinomy?" *NTS* 29 [1983] 209–21).

Räisänen emphasizes that Paul cannot be referring to Gentile Christians in Romans 2 because Paul would never say that Christians obey the law "by nature" (*phusei*, Rom 2:15). Elsewhere Paul makes it clear that one can only obey the law by the power of the Spirit (*Paul and the Law*, 104–5). Actually, we agree with Räisänen that Paul is not referring to Gentile Christians in 2:14–15; he is only referring to Gentile Christians in 2:25–29, and all Christians in 2:5–9, 13. (All Christians are probably included in 2:28–29 also, although Gentile Christians are in the forefront of Paul's mind). Paul is only thinking of occasional obedience by non-Christian Gentiles in 2:14 as the word "whenever" (*holan*) implies; he is not saying that non-Christian Gentiles keep the law completely. Obviously, we cannot defend this interpretation in depth here. Räisänen would probably respond by saying that the very complexity of the interpretation shows how impossible it is, and it also reveals the contortions that one must go through to rescue Paul. This whole debate is partially due to a different way of reading literature, for a sympathetic interpreter tries to see coherency in an author. Furthermore, the objection that an interpretation is too complex to be credible is not a logically satisfying objection, for the fact of the matter is some literature involves a great deal of complexity in interpretation because the author wrote an involved and thoughtful piece of literature. Thus, Räisänen cannot dismiss an interpretation simply because it is intricate and involved (cf. his comments in *Paul and the Law*, 4, 101–9).

49 49. Cf. here S. Lyonnet, "La circoncision du coeur, celle qui relève de l'Esprit et non de la lettre," *L'Évangile, hier et aujourd'hui. Mélanges offerts au Franz-J. Leenhardt* (Genève: Labor et Fides, 1968) 87–97; C. K. Barrett, *A Commentary on the Epistle to the Romans* (BNTC; London: Adam and Charles Black, 1957) 58; J. Murray, *The Epistle to the Romans* (NICNT; Grand Rapids: Eerdmans, 1968) 86. J. C. O'Neill says Paul could not have written this section because he would never agree that one could obey the law. The interpretation which is advocated here solves this difficulty, and thus O'Neill's radical solution is unnecessary (*Paul's Letter to the Romans* [London: Cox and Wyman, 1975] 53).

of the heart.⁵⁰ This internal circumcision is not the result of a Gentile's own merit; rather, it is a result of the work of the Spirit of God (cf. 2:29). The major problem with the view that Paul is speaking hypothetically in 2:26 is that there is no evidence in the verse or the near context to suggest a hypothetical interpretation. Indeed, Paul's reference to the work of the Holy Spirit in 2:29 intimates that he is thinking of a real obedience to the law, even if this obedience is imperfect.

The weakness of the above discussion is that we have assumed that Paul is referring to the Holy Spirit and the obedience of Gentile Christians. But what we have assumed above, that Paul is speaking of Christian obedience and the Holy Spirit, is precisely the interpretation which Sanders contests. He does not think that Paul's statements about circumcision or the Spirit in 2:28–29 are specifically Christian; this is simply part of a Jewish synagogue sermon which Paul borrowed. We will attempt to show, however, that in 2:28–29 the interrelationship between circumcision, the Holy Spirit, and the dawning of the new covenant all suggest that Paul is thinking of people who have been transformed by the Spirit of God.

Paul's basic purpose in 2:28–29 is to bring Jews to repentance. He wants them to see that it is improper to boast in their ancestry or their observance of religious rites. God is not impressed with the externals—such as one's race and one's adherence to religious rituals. Rather, God desires righteousness in the inward man—in the heart. External righteousness may be righteousness in name only; there may be observance of the letter of the law but not the spirit

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of the law. True righteousness, however, is only effected by the Holy Spirit. Thus, Paul contrasts in 2:28–29 the inward and the outward, the hidden and the obvious, the heart and the external appearance, the Spirit and the letter.

The first indication that Paul is referring to the Holy Spirit and not just the human spirit in 2:29 is the contrast between the letter (gramma) and the spirit (pneuma).⁵¹ This polarity occurs in two other passages in Paul. In 2 Corinthians 3 Paul contrasts the old covenant with the new covenant. The letter of the old covenant kills, but the Spirit of the new covenant gives life (2 Cor 3:6). It cannot be denied that in 2 Corinthians 3 Paul is referring to the Holy Spirit, for the human spirit certainly does not give life. Indeed, in 2 Cor 3:3 Paul speaks of the "Spirit of the living God" who writes Christ's letter on the tablets of the human hearts, contrasting this with a letter which is external and powerless because it is written on stone tablets. The remaining references to the Spirit in 2 Corinthians 3

50 50. The interpretation presented here fits with Watson's view that Paul emphasized justification by faith or judgment according to works in different situations, depending on the situation of his readers. See n. 48 for Watson's article.

51 51. B. Schneider rightly says that the terms "letter" and "spirit" do not refer to ways of interpreting scripture. His historical study of the interpretation *of* these two terms is also illuminating ("Letter and Spirit," CBQ 15 (1953) 163–207).

(vv 8, 17–18) without any doubt refer to the Spirit of God, and the Spirit’s advent is a sign that the new covenant is a present reality.

In Rom 7:6 Paul says the believer is released from the law and therefore he serves God in newness of Spirit, not oldness of letter. Gramma is again opposed to pneuma, and is seen as having a negative or deadening impact on a person. It is more difficult to determine whether pneumatosis here refers to the Holy Spirit, although it probably does because v 6 is a preview of Paul’s discussion on life in the Spirit in chapter 8.⁵²

A reference to the Holy Spirit in 2 Cor 3:6 and Rom 7:6 does not conclusively prove that Paul is speaking of the Spirit of God in Rom 2:29, but it is probable that Paul is speaking of the Holy Spirit in 2:29 since all three texts have the opposition between the gramma and pneuma.

Some commentators argue, however, that pneumatosis in 2:29 refers to the spiritual reality of circumcision. Barrett concedes that Paul may have the Holy Spirit in mind, but he thinks that “the meaning is more general—in a spiritual way.”⁵³ Lagrange says that the

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apostle cannot be thinking of the Holy Spirit because there cannot be opposition between the Holy Spirit and the letter.⁵⁴

Against Barrett, Cranfield notes that “the inwardness of this circumcision is already adequately expressed by kardias.”⁵⁵ And Lagrange is incorrect in failing to see the antithesis between letter and spirit. Paul’s very point in Rom 2:25–29 (and 2 Cor 3:3–6) is that the law apart from the Holy Spirit becomes a dead letter, and so the opposition between the two conceptualities is marked. Those who live according to the letter are depending on human ability, whereas those who live according to the Spirit are leaning on God. Therefore, it is altogether sensible to see an antithesis between the letter and the Holy Spirit.

The idea that the Holy Spirit is in view is also suggested by OT antecedents.⁵⁶ In the OT God did not merely demand outward conformity to the Torah; he

52 52. See particularly Käsemann, *Romans*, 190-91; Cranfield, *Romans*, 1.332.

53 53. Barrett, *Romans*, 60.

54 54. M. J. Lagrange, *Saint Paul. Épître Aux Romains* (Paris: J. Gabalda, 1950) 57.

55 55. Cranfield, *Romans*, 1.175, n. 3; cf. Käsemann, *Romans*, 75; Schneider, “Letter and Spirit,” 164; J. A. T. Robinson, *Wrestling with Romans* (Philadelphia: Westminster, 1979) 31; Lyonnet, “La circoncision du coeur,” 92.

56 56. For a discussion of the OT antecedents see E. Schweizer, “Der Jude in Verborgenen..., dessen Lob nicht von Menschen, sondern von Gott kommt. Zu Röm 2:28f und Mt 6:1–18,” *Neues Testament und Kirche. Für Rudolf Schnackenburg* (hrsg. J.

required that his people be circumcised in heart (Deut 10:16; Jer 4:4; 9:25–26). At the same time there was a growing realization that the inward circumcision of the heart must originate with God, and that no one has the ability to effect his own renewal. Thus, Israel began to look forward to a future time when God would circumcise man's rebellious heart (Deut 30:6).⁵⁷

In Paul's mind, this circumcision of the heart is accomplished in the new aeon by the Holy Spirit. Ezek 36:26–27 linked the outpouring of the Spirit with a new heart which would spontaneously obey Yahweh. This future dispensing of the Spirit was an eschatological expectation (Ezek 11:19; 39:29 ; Isa 32:15; 44:3 ; Joel 2:28–29). One of the classic passages of eschatological expectation is the new covenant passage of Jer 31:31–34. Yahweh pledges that in the end time

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he will write the law on Israel's heart, and submission to God will be joyful and spontaneous. The idea of a circumcised heart in the future is actually not much different from saying that in the end time God will send his Spirit and inwardly transform men's hearts, that he will effect a new covenant which will give people the ability and desire to obey him. Thus Schweizer says: "The future declaration that such a circumcision of the heart should be traced back to God's Spirit is prepared for through the promise of the new covenant Jer 31:33f, but above all through Ezek 36:26f."⁵⁸ Schweizer concedes that the ideas of a circumcised heart and the promise of the Spirit are not specifically linked in Ezek 36:26f, but there is such a link in *Jub.* 1:23.⁵⁹

Furthermore, 2 Corinthians 3 suggests that Paul linked the letter-spirit dichotomy with the old and new covenants. The problem with the law according to 2 Corinthians 3 is that it is a dead letter which kills (3:6) and that it is an external letter which cannot transform (3:3). The Spirit, on the other hand, gives life by placing the law on human hearts (3:3, 6). Rom 2:25–29 is quite similar to 2 Cor 3:6. Paul is criticizing physical circumcision which is external only; what really counts is an internal circumcision of the heart which is generated by the Spirit.

To sum up, there are several indications that Paul is thinking of the inbreaking of the new age in 2:28–29 . (1) The OT itself suggests that the circumcised heart will become a reality in the eschaton; (2) Paul's use of the word Spirit in 2:29

Gnilka; Basel: Herder, 1974) 118–20; Lyonnet, "La circoncision du coeur," 92; H. Ridderbos, *Paul: An Outline of His Theology* (Grand Rapids: Eerdmans, 1975) 335. 57 57. O. Michel says: "'Beschneidung des Herzens' ist nicht etwas, was ein Mensch an selbst oder am anderen vollziehen kann, sondern Gottes eigenes Werk (Dt 30:6)" (*Der Brief an die Römer* [Göttingen: Vandenhoeck & Ruprecht, 1978] 135). 58 58. This is my translation from the German (Schweizer, "Der Jude in Verborgenen," 121). 59 59. *Ibid.*

implies that the new age has dawned, for the Spirit effects a true obedience to the law (Ezek 36:26–27; Joel 2:28–29); (3) the link between letter-spirit and old and new covenants in 2 Corinthians 3 would seem to indicate that the letter-spirit dichotomy in 2:28–29 also points to an eschatological fulfillment.⁶⁰

The OT antecedents which we have traced for 2:28–29 show that there is some credibility in Sanders' contention that the passage is typically Jewish. But this is hardly surprising because Paul thought

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that the arrival of the new covenant was a fulfillment of promises contained in the OT. Nevertheless, the eschatological character of Paul's language in 2:28–29 reveals that his statements here cannot be confined to Judaism. Indeed, Sanders' claim that Phil 3:3 and Rom 2:28–29 contain radically different statements on circumcision is unconvincing. There is no doubt that the texts are not identical, but both passages imply that true circumcision is internal, that it is effected by the Spirit of God, and that Christians are the genuine people of God since they possess the true circumcision of the heart.

If the above argument on Rom 2:25–29 is convincing, then Paul is thinking of Gentile Christians who by the power of the Spirit are fulfilling the true intention of the law (cf. Rom 13:8–10; Gal 5:14). Why would Paul mention this in a context (Rom 1:18–3:20) where he is trying to prove the sinfulness of all humanity, and in particular the Jews? Probably because one of Paul's purposes in proclaiming the gospel was to incite the Jews to jealousy by contrasting their disobedience with Gentile obedience (Rom 11:11, 13–14). So when he focuses on Jewish disobedience and failure to obey the law, he also emphasizes that the Gentiles who submit to the gospel are in reality the true people of God.

In addition, he had already demonstrated that all Gentiles were under sin in Rom 1:18–32, and thus he probably never thought that anyone would conclude, from his statements in chapter 2, that Gentiles apart from Christ could obey the law but Jews who were separated from Christ could not. Indeed, it was probably inconceivable to Paul that anyone could possibly think that he thought Gentiles could keep the law while Jews were unable to fulfill it. After all, the sinfulness and degradation of the Gentile world were common wisdom among the Jews of Paul's day (Wis 14:22–31; cf. Rom 1:18–32).

The other problem with Sanders' view of Romans 1–2 is that he seriously underestimates Paul's abilities as a logical and coherent thinker. Although he attempts to provide a reason for why Paul included Romans 2, the role of the chapter in Paul's argumentation becomes rather mystifying since Sanders thinks

60 60. The following scholars also see the idea of the inbreaking of a new age in Rom 2:28–29. O. Cullmann, *Salvation in History* (New York: Harper & Row, 1967) 261; Ridderbos, *Paul*, 334–35; Calvin, *Romans*, 57; Käsemann, *Romans*, 74.

the chapter is grossly exaggerated and contradictory.⁶¹ Sanders makes the mistake of failing

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to see the complexity and integrity of Paul's statements in Romans 2.

It is important to remember that the kind of dialectic which we see in Romans 2 is characteristic of Paul elsewhere. Two examples (which are discussed below) of this kind of dialectic in Paul should suffice. Räisänen charges that Paul contradicts himself because sometimes he says the law is abrogated and other times he says Christians should fulfill the law.⁶² Räisänen has certainly detected a tension in Paul's thought, but it is incredible to believe that Paul was unaware of this tension.

For example, in Gal 5:3 Paul reproaches the Galatians because their acceptance of circumcision implies that they are bound to keep the whole law. The adoption of circumcision would be fatal because no one can be justified by law (Gal 5:4). Indeed, up until Gal 5:13 the theme of the entire letter has been that the Galatians are not under law. Suddenly, in Gal 5:14 Paul exhorts believers to fulfill the "whole law." Has Paul completely forgotten the theme of the first five chapters? Indeed, was he so unintelligent that he failed to see that he had just insisted (Gal 5:3) that the Galatians should not submit to circumcision because then they would have to obey the whole law?

It is highly unlikely that Paul was so obtuse. One can fail to plumb the intellectual complexity of a writer like Paul unless one interprets him sympathetically. This is not a special pleading either, for most intelligent writers, whether religious or not, are complex because any sound attempt to explain reality will inevitably be complicated. One should be very careful, therefore, of saying that any writer, and especially a genius like Paul, is contradictory unless there is clear and compelling evidence for such a conclusion.

When Paul speaks of fulfilling the whole law in Gal 5:3 and 5:14, he means two different things by the phrase "the whole law" as the context of each verse clearly shows. The statement in 5:3 implies that submission to circumcision

61 61. Räisänen in his recent book on *Paul and the Law* also stresses that Paul's thought on the law is incoherent and contradictory (see also "Theological Difficulties," 301–20). One wonders if Paul was so intellectually confused that his thinking on the law was simply rife with contradictions. The sheer quantity of the contradictions which Räisänen sees in Paul should give one pause. It is more plausible that Paul was aware of these tensions in his thinking and that he did not think they were contradictory. The complexity of Paul's theology can be explained in part from Paul's attempt to explain both the discontinuity and continuity between the OT and the NT.

62 62. Räisänen, *Paul and the Law*, 42–73, 82–83.

means that one must observe every single precept of the law to obtain justification, but in 5:14 Paul is

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not referring to an obedience to the law which merits justification. Gal 5:14 speaks of the whole law being fulfilled through love, and love is not a means of attaining justification; instead, it is the natural result of yielding to the Holy Spirit and letting him work in one's life. F. F. Bruce shows the connection between the two verses: "Whereas *ho nomos* in v. 3 is the sum-total of the precepts of the law, *ho pas nomos* here is the law as a whole—the spirit and intention of the law."⁶³

1 Cor 7:19 is another verse which reflects the same tension with respect to the law. Paul says, "For neither circumcision counts for anything nor uncircumcision, but keeping the commandments of God." One could argue that Paul was being inconsistent and contradictory here because circumcision was one of the commandments of God. How could Paul speak of fulfilling God's commandments and at the same time say that circumcision does not matter when the OT makes it clear that circumcision does matter? It is unlikely that Paul is contradicting himself here. Sanders might argue that Paul was unaware of the tension between the commandments of God and circumcision in this passage. But since the tension is contained in a single verse and since Paul obviously knew that circumcision was one of the commandments of the OT, it is more probable that Paul thought that one could "fulfill" the law without obeying the whole OT law.⁶⁴ Paul's statement in 1 Cor 7:19 illustrates both the continuity and discontinuity of his thinking with the OT. Some continuity is evident because the commandments of the OT are still important, but discontinuity with the OT cannot be denied either

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63 63. Bruce, *Galatians*, 241; Betz says that Paul does not mean a detailed fulfillment of the OT law in Gal 5:14 but a fulfillment in "principle" (*Commentary to Galatia*, 273). In Gal 5:3 the focus is on the distributive quality of the noun, i.e., the Galatians are obligated to obey each and every law. But in Gal 5:14 the emphasis is quite different; the use of *pas* in the attributive position suggests that Paul is thinking of fulfilling the law as a totality and not of fulfilling every detailed precept (cf. M. Zerwick, *Biblical Greek* [Rome: Scripta Pontificii Instituti Biblici, 1979] 61).

64 64. Cf. C. K. Barrett, *A Commentary on the First Epistle to the Corinthians* (HNTC; New York: Harper & Row, 1968) 169. Räisänen in his discussion of 1 Cor 7:19 thinks that the statement about keeping the commandments of God is typically Jewish, but he fails to see that this is an oversimplification because circumcision is excluded from being one of the commandments of God. No Jew would have thought such a statement was Jewish at all. The verse shows, once again, that Paul's statements about the law have both continuity and discontinuity with the OT (*Paul and the Law*, 67-68).

because circumcision is no longer considered binding. The complexity of Paul's thinking on the relationship of the OT law to the new covenant era shines out clearly in this verse.

To sum up, it is improbable that Paul is guilty of blatant contradictions in Romans 2. As a human being who wrote intelligent letters, it is unlikely that Paul would make such an obvious mistake. Paul's thinking on the law is complex and intricate, but Sanders is incorrect when he says that Paul is contradictory in Romans 2. To sum up, Paul's statements on the fulfillability of the law in Romans 2 do not overturn his claim elsewhere that no one can obey the law perfectly because Paul is not saying that Gentiles obey the law flawlessly; he is speaking of Gentile Christians who fulfill the true intention of the law by the power of the Holy Spirit.

Conclusion

Sanders tries to prove in his monograph that Paul thought it was possible to obey the law perfectly, and even if Paul did say, in some contexts, that no one keeps the law entirely, his thinking was so tortuous and contradictory that no coherent theology of law can be inferred. We have analyzed the texts which Sanders uses to demonstrate the validity of his view and have found that Sanders' position is incorrect. Paul did consistently teach that justification cannot be obtained via law because no one can keep the law perfectly. Paul's basic argument is this:

- (1) One must obey the law perfectly to be saved.
- (2) No one obeys the law perfectly.
- (3) Therefore, no one can be saved by the works of the law.

Paul did not stop, however, with this gloomy message. He proclaimed that the curse which was incumbent on all humanity because of the transgression of the law had been lifted by Jesus Christ's death on the cross. One could become a member of the redeemed community by believing in the Lord Jesus.

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