

## PAUL'S VIEW OF THE LAW IN ROMANS 10:4-5

THOMAS R. Schreiner

### I. *Introduction*

Two difficult verses for understanding Paul's view of the law are Rom 10:4-5. Rom 10:4, for example, has often been used to posit an absolute discontinuity between law and gospel since Paul says here that "Christ is the end [τέλος] of the law" Others, however, claim that to read such discontinuity into the verse is unwarranted, and they argue that Paul is asserting that "Christ is the goal of the law." In this latter view, faith in Christ is the goal to which the law points, and there is a fundamental harmony between the gospel and the OT law Although Rom 10:5 has not been as significant in the history of interpretation as Rom 10:4, the meaning of this verse has been the subject of increasing debate in recent years. Since these two verses are important for determining Paul's stance toward the OT law, it is my goal to examine various interpretations of Rom 10:4-5 and to defend the interpretation which is the most credible.

### II. *Christ is the End of the Law: Rom 10:4*

The interpretation of τέλος γὰρ νόμου Χριστός is a well-known battleground in Pauline studies,<sup>1</sup> and we cannot in this article examine in sufficient detail a verse which has been of such controversy. Nevertheless, various interpretations of the verse will be described and critiqued,<sup>2</sup> and I will attempt to defend my own view.

#### 1. *The Law Is Abolished*

One of the dominant views in NT scholarship, especially in Lutheran circles, is that Christ is the end of the law in the sense that the OT law is

<sup>1</sup> For the history of interpretation see R. Badenas, *Christ the End of the Law: Romans 10:4 in Pauline Perspective* (JSNTSup 10; Sheffield: JSOT, 1985) 7-37; J. A. Nestingen, *Christ the End of the Law: Romans 10:4 as an Historical Exegetical-Theological Problem* (Ph. D. dissertation, University of Toronto, 1984).

<sup>2</sup> It should be noted that some of the scholars fit into more than one of the categories listed below, indicating that there is some fluidity between some of the interpretations. The most notable contrast is between those who translate τέλος as "goal" and those who translate it as "end."

now abolished for the believer.<sup>3</sup> Christians are no longer under the law (cf. Rom 6:14-15; Gal 5:18), and thus the Mosaic law is not binding for the believer. Even the moral law of the OT is abolished since the whole law has passed away (cf. Gal 5:3), and no distinctions between various parts of the law can be supported either from Jewish literature or Paul.

This interpretation is difficult to tackle in a brief space because it introduces the thorny issue of how the Testaments relate to one another. The major defect of this view is that other statements in Romans (2:26; 8:4; 13:8-10; cf. also 1 Cor 7:19; Gal 5:14) indicate that Paul expected believers to obey the moral norms of the Mosaic law. For example, in Rom 13:8-10 Paul lists some specific commands from the OT, and makes it clear that he expects believers to fulfill them. If some of the moral norms of the OT law are still binding on believers, then it is difficult to see how Christ can be the absolute end of the law.<sup>4</sup>

## 2. Messianic Age Ends Age of Law

A view related to the above one is that Paul believed that the era of law has come to an end with the arrival of the Messianic era. When Rom 10:4 says that "Christ is the end of the law," the point is that Christ inaugurated the Messianic age, and since the Messianic age has begun the law is no longer in force. This view is often defended by showing that it was a common Jewish conception that the law would be abolished with the onset of the Messianic epoch.<sup>5</sup>

<sup>3</sup> H. Räisänen, *Paul and the Law* (Philadelphia: Fortress, 1983) 54-55; E. Käsemann, *Commentary on Romans* (Grand Rapids: Eerdmans, 1980) 282-83; W. Schmithals, *Der Römerbrief: Ein Kommentar* (Gütersloh: Gerd Mohn, 1988) 370; W. C. Linss, "Exegesis of *telos* in Romans 10:4," *BR* 33 (1988) 6, 10-11; E. Hahn, "Das Gesetzesverständnis im Römer- und Galaterbrief," *ZNW* 57 (1976) 50; S. Westerholm, *Israel's Law and the Church's Faith: Paul and His Recent Interpreters* (Grand Rapids: Eerdmans, 1988) 130; C. K. Barrett, "Romans 9:30-10:21: Fall and Responsibility in Israel," *Essays on Paul* (Philadelphia: Westminster, 1982) 147; H. Schlier, *Der Römerbrief* (HTKNT; Freiburg: Herder, 1971) 311; O. Michel, *Der Brief an die Römer* (MeyerK; Göttingen: Vandenhoeck & Ruprecht, 1966) 255; G. Dellings, "τέλος," *TDNT* 8.56; R. Aldrich, "Has the Mosaic Law Been Abolished?" *BSac* 116 (1959) 322-35; A. van Dülmen, *Die Theologie des Gesetzes bei Paulus* (SBM 5; Stuttgart: Katholisches Bibelwerk, 1968) 126.

<sup>4</sup> Of course, all of these verses in Romans could be interpreted in another way. For a more detailed defense of the ongoing validity of the law see T. R. Schreiner "The Abolition and Fulfillment of the Law in Paul," *JSNT* 35 (1989) 47-74; K. N. Snodgrass, "Spheres of Influence: A Possible Solution to the Problem of Paul and the Law," *JSNT* 32 (1988) 96, 99, 105-7.

<sup>5</sup> J. A. Fitzmyer, "Paul and the Law," *A Companion to Paul: Readings in Pauline Theology* (ed. M. J. Taylor; New York: Alba, 1975) 75, previously published in *The Jurist* 27 (1967) 18-36; H. J. Schoeps, *Paul: The Theology of the Apostle in the Light of Jewish Religious History* (Philadelphia: Westminster, 1961) 171-75; A. Schweitzer, *The Mysticism of St. Paul the Apostle* (London: A. C. Black, 1931) 191-192; van Dülmen, *Die Theologie des Gesetzes*, 126. For a careful evaluation of the evidence see W. D. Davies, *Torah in the Messianic Age /or the Age to Come* (Philadelphia: SBL, 1952).

The fatal defect in this theory is the weakness of the alleged Jewish evidence.<sup>6</sup> Adequate proof is lacking in rabbinic literature that the law would in fact be abrogated during the Messianic age. Moreover, even if such a theory could be defended in rabbinic literature, there is no clear evidence in Paul for such a theory. Neither Rom 10:4 nor any text from anywhere else in Paul (e.g., Galatians 3) says that the law has come to an end now that the Messianic era has arrived. Finally, even if one were to say that Rom 10:4 and Galatians 3 do teach that the law has ended now that the Messianic age has been inaugurated, then the same objection we noted for the first view would apply, viz., Paul could not have taught that the law has ceased to have any binding authority on believer since he cites moral norms from the law as authoritative for the church.

### 3. *Law Has Ended as a Way of Salvation*

Other scholars claim with a closely related theory that the law has come to an end as a way of salvation.' Righteousness in the OT era was via the law, but now that Christ has come right standing with God is no longer based on the law. There is some ambiguity regarding what scholars mean when they say that salvation was by law in the Mosaic era, but now that Christ has come salvation is only through him. Presumably some are merely saying that although salvation in the OT was still by faith, such faith involved offering sacrifices and the performance of other commandments in the OT law. Now that Christ has come sacrifices and other prescriptions of the law are no longer necessary. The sacrifice of Christ has replaced the OT cultus. The idea that the sacrifice of Christ has replaced OT sacrifices is surely in accord with Pauline theology, but it is hardly evident that Paul is proclaiming the end of the OT law and sacrificial system in this sense in Rom 10:4. No discussion on the atoning work of Christ is to be found here. We shall argue below that there is a better way to explain the flow of thought in Rom 10:3-5.

Other scholars who see the law as coming to an end as a way of salvation seem to be suggesting that there are two different ways of salvation, one

<sup>6</sup> Cf. E Schäfer, "Die Torah der messianischen Zeit," ZNW 65 (1974) 27-42; E. Bammel, "Νόμος Χριστοῦ," SE III (TU, 88 [1964]) 120-23.

<sup>7</sup> P. Althaus, *Der Brief an die Römer* (NTD; Göttingen: Vandenhoeck & Ruprecht, 1959) 108; H. W Schmidt, *Der Brief des Paulus an die Römer* (THKNT; Berlins Evangelische Verlagsanstalt, 1963) 175; R. Mohrlang, *Matthew and Paul: A Comparison of Ethical Perspectives* (SNTSMS 48; Cambridge: Cambridge University Press, 1984) 27; J. Reumann, *Righteousness in the New Testament* (Philadelphia: Fortress, 1982) 88; R. N. Longenecker, *Paul: Apostle of Liberty* (Grand Rapids: Baker, 1964) 144-47; G. E. Ladd, *A Theology of the New Testament* (Grand Rapids: Eerdmans, 1974) 502-3; E. G. Gulin "The Positive Meaning of the Law According to Paul," *LQ* 10 (1958) 116; Dellling, "τέλος," *TDNT* 8.56; A. Nygren, *Commentary on Romans* (Philadelphia: Fortress, 1949) 379-80; J. Munck, *Christ and Israel: An Interpretation of Rom. 9-11* (Philadelphia: Fortress, 1967) 84, van Dülmen, *Die Theologie des Gesetzes*, 126.

based on the law and one based on the gospels. If this is what some scholars have in mind, then this is not a convincing solution. Paul appeals to both Abraham and David (Rom 4:1-8) to teach that salvation has always been by faith, and that there is not a distinct way of salvation in the OT. Moreover, Rom 9:31-32 demonstrate that Paul does not criticize the Jews for pursuing the law. The problem is *the way they pursued the law*, i.e. "not from faith but as from works."

#### 4. *Christ Is the End of the Ceremonial Law*

It has also been claimed that Christ is the end of only part of the law, viz., the ceremonial law.<sup>9</sup> However, it is not at all clear in this context that Paul is referring to only part of the law, nor does this view explain adequately why righteousness is now available since the ceremonial law has been set aside. Is salvation by law more easily attainable with the moral law in force?

#### 5. *The Exclusivity of the Law Is Set Aside*

Some claim that the point here is that Christ is the end of the exclusiveness of the law. Now salvation is also available to the Gentiles, and the Jews of Paul's day have wrongly limited it to themselves.<sup>10</sup> There is little doubt that Paul focuses on the inclusion of the Gentiles in Romans 9-11 (cf. 9:24-26; 10:11-13, 19-20; 11:11-22). But this is not the central theme of Romans 9-11. In these chapters God's faithfulness with respect to his promises for the Jewish people (cf. Rom 9:6) is the theme.<sup>11</sup> Moreover, the specific problem in Rom 9:30-10:3, I have argued elsewhere, cannot be limited to the nationalism of the Jews.<sup>12</sup> Practices which separated Jews from Gentiles, such as circumcision, Sabbath, and food laws, are not even mentioned in this section of the letter. It seems that the most natural way of reading Rom 9:32 and 10:3 is to see the Jews faulted for attempting to be righteous on the basis of their works, and these works cannot be limited to part of the law: Thus, a critique of works-righteousness in a broad sense is evident in this

<sup>8</sup> A number of scholars in the first category listed above may be of this persuasion as well. The lack of precision in the way this view has been expressed makes it difficult in some cases to delineate specifically what some scholars have in mind when they say the law has come to an end as a way of salvation.

<sup>9</sup> So, e.g., C. Haufe, "Die Stellung des Paulus zum Gesetz," *TLZ* 91 (1966) 171-78.

<sup>10</sup> M. A. Getty, "An Apocalyptic Perspective on Rom 10:4," *HBT* 4-5 (1982-83) 97, 100; id., "Paul and the Salvation of Israel: A Perspective on Romans 9-11," *CBQ* 50 (1988) 466-67; F. Refoulé, "Romains X,4. Encore Une Fois," *RevBib* 91 (1984) 339; J. D. G. Dunn, *Romans* (WBC; Dallas: Word, 1988) 2:598; F. Watson, *Paul, Judaism and the Gentiles: A Sociological Approach* (SNTSMS 56; Cambridge: Cambridge University Press, 1986) 165; van Dülmen, *Die Theologie des Gesetzes*, 127.

<sup>11</sup> So also B. L. Martin, *Christ and the Law in Paul* (NovTSup 62; Leiden: Brill, 1989) 133.

<sup>12</sup> See "Israel's Failure to Attain Righteousness in Romans 9:30-10:3," *TrinJ* 12 (1991) 209-20.

text. And even though Paul proclaims the inclusion of Gentiles in Romans 9-11, the Jews are not specifically reproved for being too exclusive in Rom 9:30-10:8. Instead, they are censured for failing to obey the law and for legalism.<sup>13</sup>

### 6. *Christ Is the Gael of the Law*

An increasingly popular interpretation, which was also prominent, if not dominant, in the history of the church,<sup>14</sup> is the conception that Christ is the goal of the law<sup>15</sup> A more extended critique will be given of this interpretation in view of its increasing popularity and its historical significance.

Robert Badenas' claim that τέλος must be translated teleologically in Rom 10:4 is debatable,<sup>16</sup> for-whatever one makes of the term outside the NT-in the Pauline corpus and the rest of the NT the semantic range of the word is used more commonly with a temporal rather than a teleological meaning. Curiously even Badenas' own summary of Pauline usage could be interpreted to support such a conclusion:<sup>17</sup> (1) twice the word means "fully" or "completely" (2 Cor 1:13; 1 Thess 2:16); (2) three times it

<sup>13</sup> Similarly, E Mussner's view (" 'Christus [ist] des Gesetzes Ende zur Gerechtigkeit für jeden, der glaubt,' [Röm 10:4]," in *Paulus-Apostat oder Apostel?* [ed. M Barth et al.; Regensburg: E Pustet, 1977] 31-44) that Paul is speaking of the end of the law only for the Gentiles but not the Jews is not persuasive. Paul indicts *the Jews* in these verses because they were attempting to establish their own righteousness (Rom 10:3), not because they were imposing the law on the Gentiles. For an effective refutation of Mussner see Schmithals, *Römerbrief*, 370.

<sup>14</sup> See the historical surveys of Badenas and Nestingen cited in n. 1 above.

<sup>15</sup> D. P. Fuller, *Gospel and Law: Contrast or Continuum?* (Grand Rapids: Eerdmans, 1980) 84-85; C. T. Rhyne, *Faith Establishes the Law* (SBLDS 55; Chico: Scholars, 1981) 103-4; idem, "Nomos Dikaioynes and the Meaning of Romans 10:4," CBQ47 (1985) 492-93; L. Gaston, "For All the Believers: The Inclusion of Gentiles as the Ultimate Goal of Torah in Romans," *Paul and Torah* (Vancouver: University of British Columbia Press, 1987) 130; C. E. B. Cranfield, *A Critical and Exegetical Commentary on the Epistle to the Romans* (ICC; Edinburgh: T & T Clark, 1975, 1979) 2.519-20; B. Reicke, "Paulus über das Gesetz," TZ 41 (1985) 247-49; E Flückiger, "Christus des Gesetzes τέλος," TZ 11 (1955) 153-54; P W Meyer "Romans 10:4 and the 'End' of the Law," *The Divine Helmsmen: Studies on God's Control of Human Events, Presented to Lou H. Silberman* (ed. J. L. Crenshaw & S. Sandmel; New York Ktav, 1980) 65-66, 68; W S. Campbell, "Christ the End of the Law: Romans 10:4," *Studia Biblica 1978: 111. Papers on Paul and Other New Testament Authors. Sixth International Congress on Biblical Studies* (ed. E. A. Livingstone; JSNTSup 3; Sheffield: JSOT Press, 1980) 74-77; G. E. Howard, "Christ the End of the Law: The Meaning of Romans 10:4ff," JBL 88 (1969) 333; J. Ziesler, *Paul's Letter to the Romans* (Philadelphia: Trinity Press International, 1989) 257-58; Badenas, *Christ the End*, 114-17; W C. Kaiser, Jr., "Leviticus 18:5 and Paul: Do This. and You shall Live (Eternally?)" JETS 14 (1971) 26; J. E. Toews, *The Law in Paul's Letter to the Romans* (Ph.D. dissertation, Northwestern University, 1977) 220-42; G. N. Davies, *Faith and Obedience in Romans: A Study in Romans 1-4* (JSNTSup 39; Sheffield: JSOT, 1990) 187-89; R. Bring, "Paul and the Old Testament: A Study of the Ideas of Election, Faith, and Law in Paul, with Special Reference to Rom. 9:30-10:13," ST 25 (1971) 45-46; Snodgrass, "Spheres of Influence," 107.

<sup>16</sup> See his word study in *Christ the End* 38-80. Against Badenas, see Dunn, *Romans* 2.589.

<sup>17</sup> Badenas, *Christ the End*, 78-79. We omit the use of τέλος in Rom 13:7 since it refers to the paying of taxes.

denotes "the eschatological end" (1 Cor 1:8; 10:11; 15:24); (3) twice "final destiny" (2 Cor 11:15; Phil 3:19); and (4) five times it is teleological (Rom 6:21-22; 10:4; 2 Cor 3:13; 1 Tim 1:5). It should be observed that the first three categories above match the semantic range of "end" more than they do "goal." It cannot be denied that the range of τέλος is dynamic, and thus it does not always refer to a *temporal* end. But Badenas' claim that the translation "goal" is lexically required in Rom 10:4 is at least debatable even from his own presentation of the evidence.

What is even more significant is that, contrary to Badenas, 1 Tim 1:5 seems to be the only clear example of the word τέλος meaning "goal" in the Pauline corpus. The other four examples Badenas lists are all disputed. The two uses of τέλος in Rom 6:21-22 should be translated as "outcome, "or "result," not "goal." The words "outcome" Or "result" Signify an inevitable result, while "goal" suggests an intended purpose.<sup>18</sup> Paul says of evil deeds that "the end [τέλος] of those things is death" (v. 21). Conversely, "the end [τέλος]" of sanctification "is eternal life" (v. 22). Surely the "goal" of wickedness is not "death"! When Paul speaks of the τέλος of wickedness, he is referring to the "result," "consequence," or "outcome" of evil behavior. The parallelism of the verses indicates that the word τέλος should be construed similarly in v. 22.<sup>19</sup>

Contrary to Badenas, the meaning of τέλος in 2 Cor 3:13 is most likely "end" not "goal."<sup>20</sup> This is suggested by the participle καταργουμένου, which modifies τέλος in v. 13. The verb καταργέω in this context refers to the passing away or cessation of the old covenant (cf. 2 Cor 3:7, 11).<sup>21</sup> 2 Cor 3:11 makes this particularly clear. The covenant which is "passing away" (καταργούμενον) is contrasted with one that is "remaining" (μένον). One cannot separate in 2 Corinthians 3 the end of the splendor on Moses' face (v. 13) from the passing away of the old covenant (v. 11), for Paul uses the cessation of glory on Moses' face as an illustration of the passing away of the old covenant.<sup>22</sup>

Nonetheless, Badenas' claim that τέλος means "goal" in 2 Cor 3:13 is still a possibility. To interpret τέλος as goal, however, probably reads too

<sup>18</sup> All results, of course, may be construed as the intended purpose of God. One needs to be careful, though, of defining terms on the basis of this truism.

<sup>19</sup> Interestingly Badenas himself (*Christ the End*, 74) links Rom 6:21-22 with 2 Cor 11:15 and Phi13:19 earlier, but then he places Rom 6:21-22 in a different category in his conclusions (pp. 78-79).

<sup>20</sup> Badenas, *Christ the End*, 75.

<sup>21</sup> L. L. Belleville (*Reflections of Glory: Paul's Polemical Use of the Moses-Doxa Tradition in 2 Corinthians 3.1-18* [JSNTSup 52; Sheffield: JSOT, 1991 ] 204-5) argues that the word καταργέω means "fading." But support for this definition is not strong. The evidence points to καταργέω meaning "to bring to an end," "nullify," and "abrogate." Rightly R. B. Hays, *Echoes of Scripture in the Letters of Paul* (New Haven: Yale University Press, 1989) 134-35; O. Hofius, "Gesetz und Evangelium nach 2. Korinther 3," in *Paulusstudien* (WUNT 51; Tübingen: Mohr 1989) 96-99.

<sup>22</sup> Badenas' comments (*Christ the End*, 75) on this text are quite murky so that it is difficult to understand his interpretation.

much into the word in this context. Linguistically, it is preferable to see redundancy at work here. Paul uses the redundant expression "the end of what is passing away" to drive home his point.<sup>23</sup> What is particularly instructive is to note that in 2 Cor 3:13 there is a prepositional construction (εἰς τὸ τέλος). In every other passage in the NT where there is a preposition before the word τέλος, it never means "goal" or even "outcome" or "result." In fact, in seven of these texts the temporal meaning is clearly present.<sup>24</sup> The temporal meaning is quite possibly present in four other texts with a prepositional phrase, and once again the meaning "goal" is not possible in these texts.. The prepositional phrase εἰς τὸ τέλος in 2 Cor 3:13, therefore, most probably means "to the end."

The above discussion does not prove that τέλος refers to a temporal end in Rom 10:4, but it does show that the theory that it often means "goal" in Paul cannot be sustained. In fact, the meaning "goal" is indisputably present in only one text in the Pauline corpus (1 Tim 1:5), while the temporal meaning is quite common. Both interpretations are possible given the use of the word, but the way Paul usually utilizes the term causes one to expect the meaning "end."<sup>27</sup> Thus, the meaning "end" seems preferable linguistically to "goal" unless there are compelling contextual reasons for preferring "goal."~ I will t~ to show later that such contextual reasons are not present.

It is also argued by some that the racing imaged of Rom 9:30-33 suggests that "goal" is the most appropriate translation of τέλος.<sup>29</sup> Belief in Christ

<sup>23</sup> For some helpful comments on redundancy see M. Silva, *Biblical Words and Their Meaning: An Introduction to Lexical Semantics* (Grand Rapids: Zondervan, 1983) 153-55.

<sup>24</sup> Matt 10:22; 24:13; Mark 13:13; 1 Cor 1:8; Heb 3:14, & 11; Rev 2:26.

<sup>25</sup> Luke 18:5; John 13:1; 2 Cor 1:13; 1 Thess 2:16. The use of the preposition with the plural τέλη (1 Cor 10:11) is not included here since the meaning of the word in the singular is what is being investigated.

<sup>26</sup> I have already presented evidence which shows that in prepositional phrases the temporal meaning predominates. The temporal meaning for τέλος is also clearly present in contexts in which it is not the object of the preposition. Cf. Matt 24:6, 14; Mark 3:26; 13:7; Luke 1:33; 21:9; 1 Cor 15:24; Heb 7:3; 1 Pet 4:7; Rev 21:6; 22:13. A temporal meaning is probably present in Matt 26:58. On the other hand, the only NT texts besides 1 Tim 1:5 which could mean "goal"-as I read the evidence-are 1 Pet 1:9 and Luke 22:37.

<sup>27</sup> Hofius ("2. Korinther 3," 110-11) shows that Badenas' observations on the grammatical character of Rom 10:4 are not accurate. In particular, Badenas thinks he has found exact parallels between Rom 10:4 and other texts in the NT and Greek literature. Hofius points out that he fails to see that τέλος in Rom 10:4 is a predicate nominative, while in these other texts-which he sees as grammatically parallel-τέλος is a subject nominative.

<sup>28</sup> The arguments against τέλος meaning "goal" also apply to those who see τέλος as referring to "summation," "completion," or "fulfillment" here. For this latter interpretation see K. Barth, *Church Dogmatics* 2/2 (Edinburgh: T & T Clark, 1957) 244-45; P. von der Osten-Sacken, *Römer 8 als Beispiel paulinischer Soteriologie* (FRLANT 112; Göttingen: Vandenhoeck & Ruprecht, 1975) 254-55. Badenas (*Christ the End*, 36-37) also points out the weaknesses of τέλος meaning "summation," "completion," or "fulfillment."

<sup>29</sup> Badenas, *Christ the End* 114-15; Gaston, "The Inclusion of Gentiles," 130; Flückiger, "Christus des Gesetzes τέλος," 154; Campbell, "Romans 10:4," 76.

is the appropriate goal, say these scholars, of pursuing the law in faith. This suggestion is flawed because it ignores the *immediate context* of 10:4, and jumps back to 9:30-33. In 10:1-3 Paul has ceased to use the racing imagery of 9:30-33 where he speaks of Israel pursuing righteousness, and thus it is inappropriate to import that imagery from 9:30-33 into the specific context of 10:1-4.<sup>30</sup>

Final arguments put forward in favor of "goal" are the larger context of Romans 9-11 and the general Pauline theology of law.<sup>31</sup> In this regard it is said by these scholars that the very thesis of Romans 9-11 is found in 9:6 where Paul says that God's word has not failed with respect to Israel. How could Paul say this if he were asserting that Christ is the end of the law? Moreover, Paul's overall view of the law is one that suggests *continuity* between law and gospel, *not contrast*.<sup>32</sup>

Even though we agree with the general thesis of the above statements, these are not telling arguments for the meaning "goal" in Rom 10:4. Both of these arguments appear to be directed against those who see an absolute discontinuity between the law and gospel.<sup>33</sup> But Rom 10:4, if τέλος is translated as "end," need not, and as we shall argue below, should not be construed as a global and overarching statement on the relationship between gospel and law. In other words, one can still translate τέλος as "end" in this specific context and hold to a positive view of the law in Paul. Thus, the general theological objections posed by those who espouse the translation "goal" are not decisive.

### 7. Christ Is the End and Goal of the Law

Others think that both options are a possibility here, arguing that "goal" and "end" combined together communicate the meaning of τέλος in Rom 10:4.<sup>34</sup> Such a solution is unlikely, for there is no other text in Paul in which τέλος combines the meanings "end" and "goal." Heikki Räisänen suggests that this solution is due to the inability of the interpreter to determine

<sup>30</sup> So also Räisänen, *Paul and the Law*, 54.

<sup>31</sup> CL here Badenas, *Christ the End*, 117-18.

<sup>32</sup> On this point see Fuller, *Gospel and Law*.

<sup>33</sup> It should be said that there is some discontinuity between the old era and new era in Paul (cf. Gal 3:15-4:7; 2 Cor 3:4-18).

<sup>34</sup> E.g., M. A. Seifrid, "Paul's Approach to the Old Testament in Romans 10:6-8," *TrinJ* 6 (1985) 7-8; E. J. Schnabel, *Law and Wisdom from Ben Sira to Paul: A Tradition Historical Enquiry into the Relation of Law, Wisdom and Ethics* (WUNT 2.16; Tübingen: Mohr 1985) 91; F. J. Leenhardt, *The Epistle to the Romans* (London: Lutterworth, 1961) 266; U. Wilckens, *Der Brief an die Römer* (EKKNT; Neukirchen: Neukirchener Verlag, 1978-82) 3.222-23; A. J. Bandstra, *The Law and the Elements of the World: An Exegetical Study in Aspects of Paul's Teaching* (Grand Rapids: Eerdmans, 1964) 105-6; Ladd, *Theology*, 502-3; F. F. Bruce, *The Epistle of Paul to the Romans* (TNTC; Grand Rapids: Eerdmans, 1963) 203; J. C. Beker, *Paul the Apostle: the Triumph of God in Life and Thought* (Philadelphia: Fortress, 1980) 91, 106-107; C. K. Barrett, *A Commentary on the Epistle to the Romans* (HNTC; New York: Harper & Row, 1957) 197-98.

which meaning is most convincing.<sup>35</sup> As noted previously the weight of the lexical evidence favors a temporal idea, and the comparative rarity of the meaning "goal" weakens this interpretation.

#### 8. *Ceasing to Use the Law to Establish One's Righteousness*

I would like to suggest that Paul is speaking experientially in this text, so that his point is that Christ is the end of using the law to establish one's own righteousness.<sup>36</sup> Those who believe in Christ cease using the law as a means of establishing their own righteousness, for believers see that righteousness comes through believing in Christ, and it cannot be attained by obeying the law.

The logical relationship between vv. 3-4 is the primary support for this view. The assertion that "Christ is the end of the law" is not merely an abstract theological proposition which Paul suddenly inserts into the discussion. Instead, a γάρ joins vv. 3-4, indicating that v. 4 is intimately wedded to v. 3. One of the crucial issues, then, is how the relationship between vv. 3 and 4 should be explained.

Before the connection between the two verses can be adequately explained, a word needs to be said about v. 3 itself. "The Jews did not subject themselves to the righteousness of God, being ignorant about the righteousness of God and seeking to establish their own." I have argued elsewhere that the fault of the Jews in v. 3 cannot be limited to nationalistic righteousness, as if Paul were saying that the sole problem of the Jews is that they excluded the Gentiles from participation in covenantal blessing.<sup>37</sup> The main proposition in v. 3 is that the Jews "have not subjected themselves to the righteousness of God." I understand this to mean that the Jews have not submitted themselves to the divine activity of God by which he declares those who trust in him to be righteous. The two participles (ἀγνοοῦντες and ζητοῦντες) in v. 3 are causal, in that they explain *why* the Jews did not submit themselves to the saving righteousness of God. The reasons given are *because* they were ignorant of God's righteousness and *because* they were trying to establish their own righteousness. Now these two reasons should

<sup>35</sup> *Paul and the Law*, 53.

<sup>36</sup> Longenecker, *Apostle of Liberty*, 152-53; S. K. Williams, "The 'Righteousness of God' in Romans," *JBL* 99 (1980) 284; H. Hübner, *Law in Paul's Thought* (Edinburgh: T & T. Clark, 1984) 138; R. Bultmann, "Christ the End of the Law," in *Essays Philosophical and Theological* (London: SCM, 1955) 36-66, esp. p. 54; L. Morris, *The Epistle to the Romans* (Grand Rapids: Eerdmans, 1988) 380-81; J. Murray, *The Epistle to the Romans* (NICNT; Grand Rapids: Eerdmans, 1959-65) 49-50; U. Luz, *Das Geschichtsverständnis des Paulus* (BEvT 49; Munich: Kaiser, 1968) 139-45, 156-58; Nygren, *Romans*, 389; W. Gutbrod, "νόμος," *TDNT* 4.1075. A similar view is held by Martin (*Christ and the Law*, 144). He says that Christ is the end of the enslavement, condemnation, and death which the law brings. It should be said here that agreement with Bultmann's position on this specific text does not necessitate an existentialist interpretation of Paul.

<sup>37</sup> See n. 12 above.

not be sharply distinguished since those who are ignorant of God's saving righteousness, the gift of his grace, and his glory will inevitably try to establish their own righteousness and godliness as a way to merit his approval.<sup>38</sup>

I conclude that Paul is countering here a form of works-righteousness in which the Jews thought that they could attain right standing with God by their works. This is the most natural way of understanding the statement that "they were seeking to establish their own righteousness." A parallel verse in the near context, Rom 9:32, informs the reader that Israel failed to attain righteousness via the law because they sought to attain righteousness "as from works" instead of by faith. Since ἔργα in Paul refers to "works" in a general sense and cannot with warrant be limited to only part of the law, and since there is no mention of matters like circumcision, food laws, or Sabbath in the context, it is fair to conclude that Paul is saying that some Jews thought they could obtain righteousness by doing what the law says.

This short excursus on the meaning of v. 3 brings us back to the important question of the relationship between the two verses. Paul's charge against the Jews in v. 3 is that they did not submit themselves to God's saving righteousness *because they were seeking to establish their own righteousness*. What is the connection when Paul then says, "For Christ is the end of the law with reference to righteousness for everyone who believes"? Sam Williams rightly observes that there is an implied proposition linking vv. 3-4.<sup>39</sup> The implied proposition, says Williams, is that the Jews were wrong in not subjecting themselves to God's righteousness. Another possibility is that the implied proposition is that those who have believed in Christ have submitted to God's righteousness. Which of these two is correct is not that crucial since in either case it is clear in the context that the Jews should have submitted to God's righteousness, and this submission would be expressed by believing in Christ. Verse 4 then provides the reason why the Jews should have subjected themselves to God's righteousness, viz., that Christ brings to an end the attempt to establish one's own righteousness. The close connection between vv. 3-4 demonstrates that Paul is not making some global theological statement on the relationship between gospel and law in v. 4. He is responding to the specific problem raised in v. 3 of people wrongly using the law to establish their own righteousness. In v. 4 Paul points out that those who believe in Christ cease using the law as a means of establishing their own, righteousness.

Such an interpretation understands εἰς as an adverbial preposition of general reference, not as introducing a result or purpose clause. Mark Seifrid's grammatical analysis shows that εἰς in such constructions often signifies result, but even his study shows that there are exceptions, and thus

<sup>38</sup> Cf. Cranfield, *Romans* 2.515.

<sup>39</sup> Williams, "The Righteousness of God," 283-84.

<sup>40</sup> So Longenecker *Apostle of Liberty*, 152-53.

the key issue here is the existing context.<sup>41</sup> The whole focus of the context is on Jews who wrongly use the law to establish their own righteousness. Verse 4 makes an experiential statement regarding this state of affairs which we paraphrase as follows: Christ is the end of using the law to establish one's own righteousness for those who believe.

Some lodge a complaint against the exegesis we suggest on the grounds that εἰς δικαιοσύνην is closer to Χριστός than it is to τέλος γὰρ νόμου.<sup>42</sup> But the latter phrase is moved up front for emphasis, and Seifrid rightly argues that εἰς δικαιοσύνην is not related to all that precedes but only to the predicate nominative τέλος νόμου.<sup>43</sup>

The words παντὶ τῷ πιστεύοντι support the idea that Paul is not making a global statement on the relationship between gospel and law: Christ is not the end of using the law for righteousness for all people. Verse 3 demonstrates that some Jews wrongly try to use the law for their own righteousness. Thus, v. 4 only claims that those who believe, who trust in Christ for their righteousness, cease trying to use the law to establish their own righteousness.

Verses 5-8 provide a ground for v. 4 as the γὰρ in v. 5 indicates.<sup>44</sup> But how do w. 5-8 function as a ground for v. 4? I understand v. 5 as follows: The one who performs the righteousness of the law will live if he observes it. Implied in this verse is the idea that no one can keep the law, and thus righteousness is not available through the attempt to keep the law. Vv. 6-8 teach that Christ has done what is impossible for people to accomplish. Righteousness does not come by doing the law, for no one can perform it perfectly; righteousness comes by trusting in Christ. Thus, w. 5-8 ground v. 4 in that they confirm that believing in Christ brings to an end any attempt to gain righteousness by the law. Verse 5 plays an important role in that it shows that the attempt to gain righteousness by law is futile since no one can obey what the law demands.

Before summarizing where we have gone, a false conclusion which could be drawn from v. 4 should be addressed. Paul is not suggesting here that before Christ came every Jew used the law to establish his or her own righteousness, but now that he has come one should be saved by trusting Christ. Paul explicitly teaches that Abraham (Rom 4:1-5; Gal 3:6-9) and David (Rom 4:6-8) were saved by faith and not by works. We think Paul mentions Christ in v. 4 because now that the fullness of time has come (Gal 4:4) the specific way in which one manifests reliance upon God and his promises is by trusting the God who sent his Son to atone for sins (cf. Rom 3:21-26).

<sup>41</sup> Seifrid, Romans 10:6-8," 9 n. 29.

<sup>42</sup> Cranfield, Romans, 2:519-20 n. 2; E. P. Sanders, *Paul, the Law, and the Jewish People* (Philadelphia: Fortress, 1983) 61 n. 114; Badenas, *Christ the End*, 116.

<sup>43</sup> Seifrid, "Romans 10:6-8," 9 n. 30. In light of Seifrid's study Räisänen's contention (*Paul and the Law*, 55 n. 59) that such an understanding is linguistically impossible is unconvincing.

<sup>44</sup> So also Rhyne, *Faith Establishes*, 111; A. Lindemann, "Die Gerechtigkeit aus dem Gesetz: Erwägungen zur Auslegung and zur Textgeschichte von Römer 10:5," *ZNW* 73 (1982) 239.

In summary, it seems to me that the main problem with most interpretations of Rom 10:4 is that scholars are trying to support their whole understanding of the relationship between the law and the gospel on the basis of this text. Accordingly, great battles are fought over whether Christ is the goal or end of the law. The issues in this theological dispute are utterly crucial, and they need further discussion. But my thesis in this article is that Paul has something more modest in view in Rom 10:4. The particular problem he is countering is the human tendency to misuse the law to establish one's own righteousness. The purpose of the text is not to provide a programmatic statement on the relationship between gospel and law: Paul is responding to a specific problem, the use of the law to establish one's own righteousness. It is not surprising, then, that Rom 10:4 would contain an experiential statement, for Paul is reacting to an experiential problem. Such an attempt to establish one's own righteousness is of great consequence for Paul since those who do so have failed to submit themselves to God's saving righteousness. They should have submitted to God's righteousness since belief in Christ is the end of using the law to establish one's own righteousness for all who believe. Paul is not, therefore, giving a weighty theological pronouncement here on the relationship between the Testaments. He is simply saying that those who believe in Christ will no longer use the law to establish their own righteousness. They have submitted themselves to the righteousness of God by trusting Christ for their salvation (cf. Rom 10:6-8).

### III. *The Interpretation of Rom 10:5*

We have gotten ahead of ourselves since the interpretation of v. 5 is itself quite controversial.<sup>45</sup> The interpretation of v. 4 is coupled with one's interpretation of v. 5. We shall analyze and critique three major interpretations, and then defend our own.

#### *1. Radical Discontinuity between Law and Gospel*

Most scholars see a marked contrast between v. 5 and vv. 6-8, although there are still debates regarding what v. 5 is specifically saying. Some claim that the only point in v. 5 is that no one can obey the law sufficiently,<sup>46</sup> while others argue that Paul is only critiquing legalism.<sup>47</sup> We should examine

<sup>45</sup> The varying textual readings in 10:5 are quite complicated. For a defense of the reading in Nestle-Aland<sup>26</sup> see Lindemann, "Römer 10:5," 231-37; B. M. Metzger *TCGM*, 524-25.

<sup>46</sup> So, e.g., Martin, *Christ and the Law*, 137; Westerholm, *Israel's Law*, 129; F. Thielman, *From Plight Solution: A Jewish Framework for Understanding Paul's View of the Law in Galatians and Romans* (NovTSup 61; Leiden: Brill, 1989) 113-14; van Dülmen, *Die Theologie des Gesetzes*, 127.

<sup>47</sup> E.g., Rhyne, *Faith Establishes*, 104-6; idem, "Romans 10:4," 494-95; Käsemann, *Romans*, 285; Schmithals, *Römerbrief*, 371-72; G. Klein, "Sündenverständnis and theologia crucis bei Paulus," in *Theologia Crucis-Signum Crucis: Festschrift für Erich Dinkler zum 70. Geburtstag* (ed.

briefly the arguments of those who see Paul as only opposing legalism in this text, for such a tradition of interpretation has been enormously influential, especially in Lutheran circles. It is asserted that the very attempt to gain salvation by law is sinful whether it can be obeyed or not. Walter Schmithals represents this view when he says that Paul rejects law righteousness "weil der Versuch, aus dem Gesetz zu leben, also solcher fluchwürdig ist."<sup>48</sup>

Some scholars also perceive a radical discontinuity between the "spirit" and the "letter" in w. 5-8. They assert that Paul in this context uses the OT texts cited in w. 6-8 against the OT text quoted in v. 5, for part of the OT consists of "letter," while other portions are informed by the "spirit."<sup>49</sup> The "letter," according to this view, is found in the citation of Lev 18:5 in 10:5, while the "spirit" is revealed in the citations in w. 6-8. Such a distinction between the "letter" and the "spirit" is supported respectively by the use of γράφει in v. 5 and λέγει in vv. 6-8.

Contrary to the above interpretation Paul does not say that anyone who performs the law will die. Instead, v. 5 explicitly says that the person who performs the law *will live* (ὁ ποιήσας αὐτὰ ἄνθρωπος ζήσεται ἐν αὐτοῖς) by obeying it. There is no warrant for concluding that *doing the law* leads to death when Paul says precisely the opposite, viz., that doing the law leads to life. Contrary to Schmithals, Paul's statement in v. 5 only makes sense if it is assumed that no one can perfectly obey the law. The attempt to gain righteousness by law is excluded precisely because no one has the ability to put into effect what the law demands. Schmithals is correct in claiming that Paul is opposing an attempt to be righteous by works in this text. But the reason Paul sees this attempt as folly is because sinners can never obey the law perfectly and thus are fools if they think they can put God in their debt by their good works.

To see a distinction between "letter" and "spirit" on the basis of γράφει and λέγει in w. 5-8 is also unwarranted.<sup>50</sup> This can be shown from Romans 9-11 alone. He uses the verb γράφω in five other texts (Rom 9:13, 33; 10:15; 11:8, 26) in order to introduce OT citations. In all of these texts the OT is cited to confirm an argument that Paul has just made. There is no indication at all that he considers such OT citations to be "letter" rather than "spirit." Moreover, the noun γραφή is employed in three passages (Rom 9:17; 10:11; 11:2) to introduce three OT texts. Once again it is clear that Paul is using these texts in support of his argument. We can conclude

C. Andresen und G. Klein; Tübingen: Mohr, 1979) 279-80; Lindemann, "Römer 10:5," 243-46; Schlier, *Römerbrief*, 311; Schmidt, *Römer*, 175.

<sup>48</sup> Schmithals, *Römerbrief*, 371. See also other scholars listed in the previous note.

<sup>49</sup> So Käsemann, *Romans*, 286; Schmithals, *Römerbrief*, 375; Klein, "Sündenverständnis," 279; Schlier, *Römerbrief*; 311; Michel, *Römer*, 256.

<sup>50</sup> So Lindemann, *Römer 10:5*, "240; Badenas, *Christ the End*, 122-24; Toews, *The Law in Romans*, 256-57; Wilckens, *Römer*, 3.226; Refoulé, "Romans X,4," 330.

therefore that there is no evidence from the introductory formulas used in Romans 9-11 that Paul is distinguishing between "letter" and "spirit" when citing the OT<sup>51</sup>

## 2. *Jesus Christ Is the Obedient One*

Some scholars, who see Paul as saying that Christ is the goal of the law in v. 4, understand v. 5 as referring to the perfect obedience of Jesus Christ.<sup>52</sup> He is the ἄνθρωπος in v. 5 who has performed all that the law says.<sup>53</sup> The major difficulty with this interpretation is that it is hard to see in the generalizing noun ἄνθρωπος a specific reference to Jesus Christ.<sup>54</sup> Andrew Bandstra's attempt to locate a parallel in Phil 2:7-11 seems particularly strained,<sup>55</sup> for the two passages are in remarkably different contexts, and the passages differ significantly with respect to the words used. Bandstra's decision to focus on Phil 2:7-11 as a parallel text is all the more surprising since a much closer parallel in wording and theme is evident between Rom 10:5 and Phil 3:9, and this latter parallel would yield quite a different interpretation as we shall see.

## 3. *The Obedience of Faith*

Other scholars who see Christ as the goal of the law in v. 4 maintain that v. 5 is referring to an obedience of the law which springs from faith. The doing of the law in v. 5, then, is not a works-righteousness, but it is the result of trusting in God. In this interpretation there is no contrast between v. 5

<sup>51</sup> For the OT citations which are introduced with λέγω see Rom 9:15, 17, 25; 10:6, 8, 11, 16, 19, 20, 21; 11:2, 4, 9.

<sup>52</sup> Barth, *Church Dogmatics* 2/2.245; Cranfield, Romans 2.521-22; Reicke, "Paulus über das Gesetz," 249-50; Bandstra, *Elements of the World* 104, Campbell, "Romans 10:4," 77-78; R. Bring, *Christus und das Gesetz: Die Bedeutung des Gesetzes des alten Testaments nach Paulus und sein Glauben an Luther* (Leiden: Brill, 1969) 36, 44-55; id., "Paul and the Old Testament," 49-50.

<sup>53</sup> For this significance of ἄνθρωπος see Bandstra (*Elements of the World*, 104). Reicke ("Paulus über das Gesetz," 250) sees support for this in the aorist participle ποιήσας signifying once for all action. He reads too much significance into the aorist participle, which is used to designate undefined action. For a careful analysis of the aorist tense see E Stagg, "The Abused Aorist," *JBL* 91 (1972) 222-31.

<sup>54</sup> It is interesting to note, therefore, that some scholar think ἄνθρωπος is used to stress the inclusion of all people, both Jew and Gentile (so Howard, "Romans 10:4," 334; Toews, *The Law in Romans*, 269, 283; Badenas, *Christ the End* 121; Davies, *Faith and Obedience*, 198). This later view also seems to be an overinterpretation. The term ἄνθρωπος is a generalizing noun which refers to all people, but there is no particular emphasis on the inclusion of the Gentiles in the use of the word in this context.

<sup>55</sup> Bandstra, *The Elements of the World*, 103-4. Against the link with Phil 2:7-11 see Refoulé, "Romans X,4," 345; Seifrid, "Romans 10:6-8," 14.

<sup>56</sup> Fuller *Gospel and Law*, 85-88; Gaston, "The Inclusion of Gentiles," 130; Howard, "Romans 10:4," 335-37; Badenas, *Christ the End*, 118-25; Kaiser, "Leviticus 18:5 and Paul," 27; Toews, *The Law in Romans*, 243-83; Davies, *Faith and Obedience*, 189-200.

and vv. 6-8; both texts speak of the obedience that comes from faith. The following arguments are presented to support such an interpretation.

The conjunction *δέ* in v. 6 is usually translated adversatively as "but." Those who defend the theory that there is continuity between vv. 5-6 claim that such a translation is unwarranted. The conjunction *δέ* often means "and," and the context, it is claimed, favors this latter interpretation.<sup>57</sup> Thus, v. 5 and vv. 6-8 do not refer to two different ways of righteousness but one way of righteousness, for the obedience that springs from faith (vv. 6-8) naturally leads to a doing of the law (v. 5).

Verse 5 cannot stand in contrast with vv. 6-8, according to those who defend this interpretation, because Paul would never use the OT against itself. That is, in v. 5 Lev 18:5 is cited, and in vv. 6-8 Paul alludes to Deut 9:4; 30:12-14 (and perhaps Ps 107:26). We can assume, these scholars affirm, that Paul wanted to convince the Jews of the credibility of his stance regarding the OT law. But if Paul uses the OT texts alluded to in vv. 6-8 against the citation of the OT in v. 5, then no Jew would be persuaded of his argument, for the Jews believed that there was a fundamental harmony in OT Scripture. No argument which pitted OT scripture against OT scripture would carry the day with Jews who valued the OT. Moreover, Paul himself regularly appeals to the OT as authoritative, and thus it is difficult to conceive of him as denigrating part of OT revelation.

Those who see a harmony between the doing of the law and the righteousness of faith argue that the OT contexts of the two texts are quite similar. Lev 18:5 does not teach that Israel should obey the law *in order to earn salvation*.<sup>59</sup> Instead, as with the rest of the OT, this verse teaches that obedience to the law would be the expression, the intended result of God's saving work. The obedience demanded here refers to maintaining life in the covenant, not acquiring life by good works. And since sacrifice could be offered for sins committed, there is no thought in Leviticus of obeying the law perfectly in order to gain salvation. Furthermore, an analysis of Deut 30:12-14 makes it clear that Moses speaks of doing the law. Deut 30:12-14 says three times that the law should be observed. These scholars conclude, then, that the obedience of Lev 18:5 cannot be separated from the obedience of Deut 30:12-14.<sup>60</sup> Both describe the obedience that springs from faith. There is no contrast between the two texts in the OT nor in Paul.

<sup>57</sup> Fuller, *Gospel and Law*, 67; Badenas, *Christ the End* 123; Toews, *The Law in Romans*, 252-53; Davies, *Faith and Obedience* 190-91; Flückiger, "Christus des Gesetzes τέλος," 155.

<sup>58</sup> Fuller, *Gospel and Law*, 67-69; Badenas, *Christ the End*, 123; Davies, *Faith and Obedience* 194; Flückiger, "Christus des Gesetzes τέλος," 155. Badenas (121) and Toews (*The Law in Romans*, 244-45) ask how the Jews could be wrong in pursuing righteousness by works if that is what the law in fact teaches.

<sup>59</sup> So Kaiser, "Leviticus 18:5 and Paul," 19-28; Howard, "Romans 10:4," 334; Toews, *The Law in Romans*, 244-45, 253, 264-70; Davies, *Faith and Obedience* 192-93.

<sup>60</sup> Fuller, *Gospel and Law*, 85-86.

#### 4. *The Nature of the Contrast between Rom 10:4-5*

Despite some impressive arguments for continuity between Rom 10:5 and 10:6-8, it is much more likely that the relationship between these verses is adversative rather than continuative. In the course of arguing for the view that there is a contrast between v. 5 and vv. 6-8 I shall respond to the arguments given in support of continuity between v. 5 and vv. 6-8.

Those who opt for continuity between v. 5 and vv. 6-8 rightly remark that δε can be adversative or continuative. An exegetical judgment must be made on the basis of the immediate context rather than the use of this conjunction. The following arguments indicate that the context supports an adversative relationship between 10:5 and 10:6-8.

The doing of the commandments of the law in Rom 10:5 (ὁ ποιήσας αὐτά) is equivalent to the establishing of one's own righteousness in 10:3. In both verses Paul counters the idea that one can obtain righteousness through works. The parallel between w. 3 and 5 is strengthened by the particular wording employed. Verse 3 says the Jews "did not subject themselves to the righteousness of God" because they "were ignorant of the righteousness of God." The genitive Θεοῦ which is used twice with the word δικαιοσύνη in v. 3 is a genitive of source. It is a righteousness which comes from God as a gift. In v. 5 the righteousness is not from God. It is "righteousness which is from the law" (τὴν δικαιοσύνην τὴν ἐκ τοῦ νόμου, and it is based on "doing" (ὁ ποιήσας). The link between vv. 3 and 5 is as follows: because the Jews did not know that righteousness was God's gift (v. 3), they tried to gain their own righteousness based on keeping the law (v. 5).

In order to sunder the connection between w. 3 and 5, it is claimed that the verses are not parallel because the word νόμος is lacking in v. 3.<sup>61</sup> This objection is hardly persuasive, for the righteousness which the Jews tried to establish (10:3) was *based on the law*. Rom 9:31-32 demonstrates that Israel tried to attain righteousness by pursuing the law with a works mentality. The pursuit of the law "as from works" is synonymous with "seeking to establish their own righteousness" in Rom 10:3.<sup>62</sup> The connection between vv. 3 and 4 also shows that the attempt to establish one's own righteousness in v. 3 is related to the law. The verses are connected with a γάρ, and v. 4 says that "Christ is the end of the law with reference to righteousness for everyone who believes." Whatever one makes of the specific meaning of v. 4, the correlation between "law" and "righteousness" in the verse shows that the attempt to establish one's own righteousness in v. 3 is based on the law.

The argument presented above regarding the connection between Rom 10:3-4 can be expanded further. Even if we accept for the sake of argument the meaning "goal" for τέλος in 10:4, there is still the implication that the

<sup>61</sup> Davies, *Faith and Obedience*, 195-96.

<sup>62</sup> Fuller (*Gospel and Law*, 71-79), who does not agree with our interpretation of Rom 10:5-8, nevertheless rightly sees the parallel between Rom 9:31-32 and 10:3.

false righteousness of the Jews in 10:3 is based on the law. Let me explain how this is so. Verse 3 says that the Jews did not submit themselves to God's righteousness because they tried to establish their own. Verse 4 provides the reason why (γάρ) they should have submitted themselves to God's righteousness. Let us assume that Paul is saying that they should have submitted to God's righteousness and forsaken their own because Christ is the "goal" of the law: The connection between vv. 3-4, then, would indicate that the Jews tried to pursue their own righteousness because they misread the true goal or intention of the law. But if they failed to obtain righteousness because they did not see the goal of the law, then it follows that their own righteousness in 10:3 was based on *a misunderstanding of the law*. My point, then, is that even if we accept the view that τέλος means "goal" in v. 4, the false righteousness of the Jews in v. 3 is still based on the law. It follows, therefore, that both v. 3 and v. 5 describe righteousness by law, and if v. 3 refers to works-righteousness, then so does v. 5.

An adversative relationship between vv. 5 and 6-8 is also supported by the antithesis between doing *and believing* which permeates the text in Rom 9:30-10:13. Israel did not attain righteousness through the law because it was pursued "as from works" (9:32). Israel had a zeal for God (10:2) which was manifested in the establishment of their own righteousness (10:3). These texts seem parallel to the idea of gaining righteousness by *doing* (10:5). But Paul stresses again and again in this text that the way to obtain righteousness is not by doing but by believing (Rom 9:30, 32-33; 10:4, 6, 8, 9, 10, 11). Nowhere in this context does Paul speak of a doing of the law which stems from faith, although he does speak positively of obeying the law elsewhere (Rom 8:4; 13:8-10; cf. Gal 5:14). To see a fulfillment of the law which is grounded in faith in 10:5 sits awkwardly in the context of Rom 9:30-10:8, for the remaining verses posit an antithesis between doing and believing.

The close parallel between Phil 3:9 (μη̄ ἔχων ἐμὴν δικαιοσύνην τὴν ἐκ νόμου ἀλλὰ τὴν διὰ πίστεως) and Rom 10:5 (τὴν δικαιοσύνην τὴν ἐκ τοῦ νόμου) is powerful evidence supporting the idea that Rom 10:5 describes works-righteousness.<sup>63</sup> The wording of the two texts is almost exactly the same (δικαιοσύνην τὴν ἐκ νόμου, Phil 3:9; τὴν δικαιοσύνην τὴν ἐκ νόμου, Rom 10:5). All scholars agree that Phil 3:9 speaks negatively of "righteousness from law" It is extremely unlikely that the same phrase in Rom 10:5 is being used positively. This interpretation is strengthened by the fact that in both Phil 3:2-11 and Rom 9:30-10:8 Paul is responding to Jewish opponents who insisted that Gentiles must observe the OT law to be saved. The subject under discussion in Philippians 3 and Romans 10 is, therefore, the same. Paul contends that faith in Christ is what is necessary

<sup>63</sup> So also Rhyne, *Faith Establishes*, 105; Lindemann, "Römer 10:5," 239 n. 29.

<sup>64</sup> For a defense of the view that the opponents in Philippians 3 were Judaizers see P.T. O'Brien, *The Epistle to the Philippians* (NIGTC; Grand Rapids; Eerdmans, 1991) 26-35.

for righteousness, not observance of the law. Since these two texts deal with the same subject and possess almost identical wording, we conclude that they do not bear radically different meanings. In both verses Paul is excluding righteousness by works and affirming faith in Christ as the way of salvation.

It should also be emphasized that nowhere does Paul speak positively of "righteousness which comes *from* the law" (τὴν δικαιοσύνην τὴν ἐκ τοῦ νόμου, 10:5; cf. Phil 3:9). The point we are making here is that the Greek formulation ἐκ τοῦ νόμου suggests that the law is the "source" of righteousness. Paul, as we have noted previously, speaks positively elsewhere of believers keeping the law. But nowhere does he ever say that righteousness comes "from" the law. He insists again and again that righteousness comes from God and is his gift. Thus, he uses the phrase δικαιοσύνη Θεοῦ (Rom 1:11; 3:5, 21, 22; Rom 10:32; 2 Cor 5:21; Phil 3:9) as a genitive of source on numerous occasions to underscore the truth that righteousness is a gift of God. Righteousness cannot come "from" the law because the law incites people to sin (Rom 5:20; 7:5, 7-13). Those who see Rom 10:5 as a positive description of keeping the law do not appreciate sufficiently the differences between what Paul says in Rom 10:5 and other texts in which he speaks affirmatively of keeping the law. The notion that righteousness "comes from" the law is contrary to the heart of Pauline theology.

The other correlation between Phil 3:9 and Rom 9:30-10:8-which should not be missed-is the contrast between the righteousness which comes from the law and the righteousness which is on the basis of faith. Israel failed to attain righteousness because they did not seek it "by faith but as from works" (Rom 9:32). Gentiles obtained "righteousness by faith" (Rom 9:30; cf. 9:33). It is the one who "believes" (τῷ πιστεύοντι) who stops using the law to establish his own righteousness (Rom 10:4). The "righteousness which comes from the law" (Rom 10:5) is contrasted with "the righteousness by faith" (ἡ ἐκ πίστεως δικαιοσύνη, Rom 10:6). Phil 3:9 supports the claim that there is a contrast between the "righteousness which comes from the law" and "righteousness by faith" in Rom 10:5-6. In Philippians Paul goes a step beyond merely saying that his own "righteousness" was not "from the law:" He also affirms that he obtained the righteousness which is a gift from God on the basis of faith (τὴν ἐκ Θεοῦ δικαιοσύνην ἐπὶ τῇ πίστει). Phi13:9, then, not only shares the same wording as Rom 10:5 regarding "righteousness which is from the law." Paul also

<sup>65</sup> Fuller (*Gospel and Law*, 86) and Davies (*Faith and Obedience*, 196-97) contend that Rom 10:5 should be distinguished from Phi13:9 because the former passage does not speak of "one's own righteousness" as the latter does. It is unwarranted, though, to demand that every element of Phil 3:9 be reproduced in Rom 10:5.

<sup>66</sup> The meaning of δικαιοσύνη in Paul is intensely debated, and the amount of literature is enormous. The most satisfying solution has been suggested by D. Moo, *Romans 1-8* (Wycliffe Exegetical Commentary; Chicago: Moody, 1991) 65-7Q 75-86.

goes on to contrast his own righteousness with "the righteousness of God on the basis of faith." Since Phi 13:9 and Rom 10:5-6 share the same wording both regarding "righteousness from law" and "righteousness on the basis of faith," we have good evidence that both texts should be interpreted similarly. The parallel between Phil 3:9 and Rom 10:5 cannot be discounted merely by saying that the former text is personal and autobiographical, while the latter refers to a corporate reality.<sup>67</sup> This observation is correct, of course, but materially the texts still deal with the same issue. Paul in Philippians 3 is using his previous experience as an example to illustrate the false path into which the false teachers are trying to lure the Philippians.<sup>68</sup> Paul's personal experience was a corporate experience for the opponents in Philippians! So too, what was a problem for Israel corporately (Romans 9-10) plagued Paul personally (Philippians 3). The difference between Romans 9-10 and Philippians 3 is that Paul is speaking of many people in Romans who had the same problem which he formerly had according to Philippians.

Neither is it compelling to say that in Rom 10:5 the word "law" is not used to describe a false righteousness as it is in Philippians.<sup>69</sup> It is already clear from Rom 9:32 that the law if it is pursued "as from works" can be misused so as to establish one's own righteousness. The Jews thought they were righteous precisely because of their obedience to the law. This fits nicely with Rom 10:5 where the one who does the law expects to gain righteousness from the doing of the commandments. The object of the participle ποιήσας in v. 5 is the word αὐτά, and αὐτά indisputably refers to the commandments in the OT law. It follows, then, that even though the word "law" is not specifically present in v. 5, the concept is materially present, for it is the commandments of the law which people would "do." Paul does not censure the actual doing of the commandments. What he is suggesting is that no one keeps the law sufficiently. The reason he does not elaborate on human inability to keep the law in v. 5 is that this is old ground in Romans which has already been covered (1:18-3:20). What is astonishing to Paul is that people who fail to obey the law still think they can gain life by observing the commandments. Thus, Paul reminds the church that perfect obedience, which is impossible, is needed to be right before God.

Supporting the idea that Paul is speaking negatively of works righteousness in Rom 10:5 is his citation of Lev 18:5 in Gal 3:12.<sup>70</sup> Most commentators concur that in Gal 3:12 Paul quotes Lev 18:5 to contrast the law and faith.<sup>71</sup> He says, "But the law is not of faith, but the one who does

<sup>67</sup> C. Müller, *Gottes Gerechtigkeit und Gottes Volk: Eine Untersuchung zu Römer 9-11* (FRLANT 86; Göttingen: Vandenhoeck & Ruprecht, 1964) 73-74.

<sup>68</sup> Schmidt (*Römer*, 174) rightly observes that Paul once was what the Judaizers now are.

<sup>69</sup> So Fuller, *Gospel and Law*, 86..

<sup>70</sup> So Rhyne, *Faith Establishes*; 105.

<sup>71</sup> For representative examples see H. D. Betz, *Galatians* (Hermeneia; Philadelphia: Fortress, 1979) 147-48; F. F. Bruce, *The Epistle to the Galatians* (NIGTC; Grand Rapids; Eerdmans, 1982)

them [the commandments of the law] shall live by them." It is improbable that Paul is using Lev 18:5 in a different way in Rom 10:5 and Gal 3:12, for both texts treat the same theme, i.e., whether or not righteousness is available by the law. Gal 3:12 also contains the same contrast between the law and faith which we are contending is present in Rom 10:5-6. The burden of proof is clearly on those who think Paul cites Lev 18:5 in two completely different ways.

Feeling the sting of this argument, a few scholars have suggested that Paul describes the keeping of the law positively in Gal 3:12 as well.<sup>72</sup> This suggestion is completely improbable given the situation in the Galatian churches and the structure of the argument in the letter. The Galatians were under attack from opponents who insisted that they submit to circumcision to be part of the people of God (Gal 5:2-6; 6:12-13). The heart of the letter (Gal 2:15-5:12) contains a response to these opponents. Paul labors to prove that justification does not come by "works of law" (2:16; 3:2, 5, 10), that the attempt to obtain righteousness by law leads to a curse (3:10), that the law is not a source of life (3:21), and that people who are "under law" are actually under the sway of sin (3:23, 25; 4:3, 8-10, 21-25). It is implausible in the course of this argument that Paul would positively insert the proposition that one who keeps the law will obtain life (Gal 3:12). Such a statement would have played into the hands of the Judaizers, for it was they who were demanding adherence to the law for salvation. I am not denying that Paul affirms keeping the law at the end of Galatians (cf. 5:14), but he only does this after he has cleaned up the problems raised by the Judaizers.

Daniel Fuller agrees that Paul uses Lev 18:5 in a negative sense in Gal 3:12. He tries to defend the idea, however, that the OT citation has a different meaning in Rom 10:5.<sup>73</sup> In support of this he notes that no introductory formula is employed in Gal 3:12, while in Rom 10:5 Paul introduces the citation by saying "Moses writes." The reference to Moses signals, says Fuller, that in Rom 10:5 Paul is citing Lev 18:5 in accord with its intended meaning in its OT context. Fuller's stimulating proposal should be rejected. Omitting the introductory formula in Gal 3:12 is no indication that Paul is inserting the legalistic interpretation of the verse by the Judaizers. There is no introductory formula in Gal 3:11 either, and yet there is no doubt that Paul considers the OT citation from Heb 2:4 to be authoritative. If anything the inclusion of Moses in Rom 10:5 betrays the fact that there is a contrast between 10:5 and 10:6-8, for elsewhere Paul contrasts the new age with the era of law inaugurated under Moses

163; E. DeW. Burton, *A Critical and Exegetical Commentary on the Epistle to the Galatians* (ICC; Edinburgh: T & T Clark, 1921) 167; R. Y. K. Fung, *The Epistle to the Galatians* (NICNT; Grand Rapids: Eerdmans, 1988) 145-46. The specific nature of the contrast will not be investigated in detail here. See my "Works of Law' in Paul," *NovT* 33 (1991) 239-240.

<sup>72</sup> Davies, *Faith and Obedience*, 196; Toews, *The Law in Romans*, 279-82; Bring, *Christus und Gesetz*, 62; cf. also Cranfield, *Romans* 2.522 n. 2; Reicke, "Paulus über das Gesetz," 250.

<sup>73</sup> Fuller, *Gospel and Law*, 88, 98-99.

(2 Cor 3:4-18).<sup>74</sup> In any case a decisive argument would be needed to defend the idea that Paul uses Lev 18:5 differently in Gal 3:12 and Rom 10:5. The similarity of subject matter and theme lead us to the conclusion that Paul uses Lev 18:5 similarly in Gal 3:12 and Rom 10:5. A major objection to our view is that such an interpretation means that Paul uses Lev 18:5 contrary to the intended meaning of that text in the OT, and such a misuse of the OT would never convince Paul's opponents.<sup>75</sup> The best solution to this difficult problem has been suggested by Moisés Silva in an article which examines Paul's use of Lev 18:5 in Gal 3:12.<sup>76</sup> What Silva says about the use of Lev 18:5 in Gal 3:12 also applies to Rom 10:5. It is not satisfying to conclude that Paul is only citing the legalistic misinterpretation of Judaizers in Rom 10:5, but his imitation of the OT text is influenced by the scriptural exegesis of his opponents. Paul's opponents believed that the law itself could *provide* life, that it was the *source* of life. Thus, they pursued the law "as from works," expecting to secure righteousness through their obedience. Righteousness here refers to right standing before God, and the Jewish mistake was to think that they could establish their own righteousness, i.e., salvation, by their obedience to the law (Rom 10:3). Paul explains in v. 4 that those who believe in Christ cease using the law as a means of establishing their own righteousness; they recognize that Christ is the source of life, not the law. When Paul cites Lev 18:5 in Rom 10:5, his point is that no one can attain righteousness or eternal life by obeying the law since no one can obey sufficiently what the law demands.

What Paul is criticizing, then, in Rom 10:5 and indeed in the entire context of Rom 9:30-10:8 is the attempt to gain right standing with God via obedience of the law. He is rejecting the idea that the law is a possible *source* of life or righteousness, even though the perfect keeping of the law would bring such righteousness (cf. Gal 3:10-12; Rom 3:19-20). Thus, when Paul cites Lev 18:5 in v.5 his citation of that text is influenced by his Jewish opponents who put forward the verse in order to argue that the law is the source of righteousness. Paul does not flatly state that their interpretation is incorrect by explaining Lev 18:5 in context. Instead, he counters their interpretation by citing Deut 30:12-14. Silva notes it is uncommon for NT

<sup>74</sup>This point, however, should not be pressed since Paul clearly cites words of Moses as authoritative elsewhere (Rom 10:19; 1 Cor 9:9). So Seifrid, "Romans 10:6-8," 13.

<sup>75</sup>Murray (*Romans* 2.51) argues that Paul does not use Lev 18:5 in accord with its intended meaning, but the text is lifted out of context because it aptly describes legalism.

<sup>76</sup>M. Silva, "Is the Law Against the Promises? The Significance of Galatians 3:21 for Covenant Continuity," in *Theonomy: A Reformed Critique* (ed. W S. Barker and W R. Godfrey; Grand Rapids: Zondervan, 1990) 153-67, esp. 163-66.

<sup>77</sup>Of course, Paul's citation of Deut 30:12-14; 9:4 and Ps 107:26 is controversial. For some insightful comments on the OT texts cited see Thielman, *From Plight to Solution*, 113-14. There is a diversity of opinion among scholars regarding the use of the OT texts here. Paul's use of the OT is seen as arbitrary (C. H. Dodd, *The Epistle of Paul to the Romans* [MNTC; London: Hodder & Stoughton, 1932] 166; Schmidt, *Römer*, 176; M. Black, "The Christological Use of the Old Testament in the New Testament," *NTS* 18 [1981] 8-9; Rhyne, "Romans 10:4," 496),

writers to call into question the interpretation of opponents by setting forth an opposing contextual argument of the text in question.<sup>78</sup> He goes on to say, "Jewish literature contemporary to the New Testament shows a similar hesitation to score points by refuting the opponent's use of Scripture. And the later rabbinic scholars, as a rule, refuted an argument based on Scripture by counteracting with a different passage, not by demonstrating faulty hermeneutics."<sup>79</sup> In other words, Paul cites the OT in Rom 10:6-8 to show that obeying the law is not the means of obtaining righteousness; rather Christ has accomplished all that is needed for salvation. The appropriate human response is a humble faith which accepts what God has done in Christ.

The interpretation we are proposing does not deny that Paul could use Lev 18:5 in another context as a way of describing life within the covenant by the redeemed. What Paul objects to in Rom 9:30-10:8 is the use of the law as the source of righteousness or life. This interpretation also explains why the objection that perfect obedience to the law was unnecessary in the OT is irrelevant.<sup>80</sup> Atonement was provided for those within the covenant, but Paul is opposing those who think they can gain entrance into the covenant by good works. For those who try to establish their own righteousness the provision of sacrifices does not apply because on Paul's terms they are not yet within the covenant. There are also statements made by Paul (cf. Gal 2:21; 3:10-13; Rom 3:21-26) which imply that animal sacrifices no longer atone; only Christ's sacrifice is truly effective.

as a proverbial use of the wording of the OT so that there is not actually a citation (W. Sanday and A. C. Headlam, *A Critical and Exegetical Commentary on the Epistle to the Romans* [ICC; Edinburgh: T & T Clark, 1902] 289; Barrett, "Romans 9:30-10:21," 129; W. D. Davies, *Paul and Rabbinic Judaism: Some Rabbinic Elements in Pauline Theology* [London: SPCK, 1948] 153-55; R. N. Longenecker, *Biblical Exegesis in the Apostolic Period* [Grand Rapids: Eerdmans, 1975] 114, 121-23), as dependent upon wisdom traditions (M. J. Suggs, "The Word is Near You: Romans 10:6-10 within the Purpose of the Letter," in *Christian History and Interpretation: Studies Presented to John Knox* [ed. W. R. Farmer, C. F. D. Moule, and R. R. Neibuhr; Cambridge: Cambridge University Press, 1967] 299-11; Schnabel, *Law and Wisdom*, 247-49), as dependent upon Targumic traditions (S. Lyonnet, "Saint Paul et l'exégèse juive de son temps. A propos de Rom 10:6-8," in *Mélanges Bibliques rédigées en l'honneur d'André Robert* [Travaux de l'Institut Catholique de Paris, IV; Paris: Boud & Gay, 1956] 494-506; M. McNamara, *The New Testament and the Palestinian Targum to the Pentateuch* [AnBib 27; 2d printing, with Supplement containing additions and corrections; Rome: Pontifical Biblical Institute, 1978] 73-78). For a provocative analysis of the OT citations which argues that Paul appeals directly to the OT text itself, and that none of the above answers is fully satisfactory, see Seifrid, "Romans 10:6-8," 17-37. For an extended discussion of the text see also Toews, *The Law in Romans*, 284-315.

<sup>78</sup> Silva, "Is the Law Against the Promises?" 165. For a similar interpretation in some respects see H. N. Ridderbos, *Paul: An Outline of His Theology* (Grand Rapids: Eerdmans, 1975) 155-56.

<sup>79</sup> Silva, "Is the Law Against the Promises?" 165.

<sup>80</sup> Cf., e.g., G. Howard, *Crisis in Galatia: A Study in Early Christian Theology* (SNTSMS 35; Cambridge: Cambridge University Press, 1979) 53.