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**ROMANS 2:13: IS PAUL COHERENT?**

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## ABSTRACT

There is an apparent contradiction between Rom 2:13 (“the doers of the Law will be justified”) and Paul’s teaching in the next chapter (3:20, 28). Some scholars just think Paul was incoherent. Others try to resolve the apparent contradiction in one of two ways: either (1) Rom 2:13 is hypothetical, setting forth the standard that no one actually meets (3:9-10, 23), or (2) “the doers of the Law” refers to the obedience of faith and does not equal “the works of the Law” which Paul rejects elsewhere. Option 2 comes in two varieties: (2a) Gentile Christians are in view, or (2b) non-Christian Gentiles. Option 2a is currently gaining ground among both opponents and advocates of the New Perspective on Paul (Cranfield, N. T. Wright, Simon Gathercole). In this paper, I critique option 2a and defend option 1 – the hypothetical view. Paul is coherent because Rom 2:13 must be read in light of his larger argument in Rom 1-4, especially 3:9-10, 20, 23, 28.

## THE APPARENT CONTRADICTION

At the very outset it is important to recognize that there is an apparent contradiction between Rom 2:13 and Paul’s teaching in the near context and elsewhere. The full verse reads: “For it is not the hearers of the Law who are just before God, but the doers of the Law will be justified” (*οὐ γὰρ οἱ ἀκροαταὶ νόμου δίκαιοι παρὰ τῷ θεῷ, ἀλλὰ οἱ ποιηταὶ νόμου δικαιωθήσονται*).<sup>1</sup> We will look at this statement in its

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<sup>1</sup> Except when I offer my own translation, all Scriptural quotations are from the NASB (1995) with minimal changes in the interests of gender neutrality, e.g., changing “man” to “person” where appropriate.

immediate context (vv 12-16) below, but for now I simply note that Paul here states, in what seems to be a straightforward affirmation, that “the doers of the Law will be justified.” In other words, he predicates justification on the basis of doing that which the Law requires.

Now the problem that confronts interpreters of Paul is how to reconcile this seemingly straightforward affirmation with Paul’s equally straightforward – and more frequent – *denials* of the notion that a person can be justified by doing what the Law requires. Such denials are found in both Romans and Galatians. Let us begin with the passages in Galatians. In recounting the substance of his speech confronting Peter for his hypocrisy in the Antioch incident, Paul writes: “We are Jews by nature and not sinners from among the Gentiles; nevertheless knowing that a person is not justified by the works of the Law (οὐ δικαιοῦται ἀνθρώπος ἐξ ἔργων νόμου) but through faith in Jesus Christ ... since by the works of the Law no flesh will be justified (ὅτι ἐξ ἔργων νόμου οὐ δικαιωθήσεται πᾶσα σάρξ)” (Gal 2:15-16). Here Paul twice denies that a person can be justified by *ἔργα νόμου*, that is, by doing what the Law requires.<sup>2</sup>

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<sup>2</sup> In spite of contrary claims by New Perspective scholars like James D. G. Dunn and N. T. Wright, I presuppose the traditional interpretation of *ἔργα νόμου* as “doing what the Law requires” or “deeds done in obedience to the Law.” This interpretation is ably defended by Brendan Byrne, *Romans* (SP 6; Collegeville, Minn.: The Liturgical Press, 1996), 120-1; C. E. B. Cranfield, “‘The Works of the Law’ in the Epistle to the Romans,” *JSNT* 43 (1991): 89-101; A. Andrew Das, *Paul, the Law, and the Covenant* (Peabody, Mass.: Hendrickson, 2001), 188-90; Joseph A. Fitzmyer, *Romans: A New Translation with Introduction and Commentary* (AB 33; New York: Doubleday, 1993), 337-8; Douglas J. Moo, “‘Law,’ ‘Works of the Law,’ and Legalism in Paul,” *WTJ* 45 (1983): 90-99; idem, *The Epistle to the Romans* (NICNT; Grand Rapids: Eerdmans, 1996), 206-10; Thomas R. Schreiner, *The Law and Its Fulfillment: A Pauline Theology of Law* (Grand Rapids: Baker, 1993), 51-57; idem, *Romans* (BECNT; Grand Rapids: Baker, 1998),

This denial that a person can be justified by doing what the Law requires is repeated a few verses later, though in this case the phrase ἔργα νόμου is lacking: “I do not nullify the grace of God, for if righteousness comes through the Law (εἰ γὰρ διὰ νόμου δικαιοσύνη), then Christ died needlessly” (Gal 2:21). Even though the full phrase is lacking, the thought is the same. In view of the cross, the status of “righteousness” cannot come by the Law, that is, by obeying the Law. Using similar language, in the next chapter Paul says, “Now that no one is justified by the Law before God (ἐν νόμῳ οὐδεὶς δικαιοῦται παρὸ τῷ Θεῷ) is evident; for, ‘The righteous person shall live by faith.’ However, the Law is not of faith; on the contrary, ‘The person who practices (ὁ ποιήσας) them shall live by them’” (Gal 3:11-12). In Gal 2:21 and 3:11, Paul emphatically denies that righteousness (or justification) comes by or through the Law, although he uses different arguments to support his point. In Gal 2:21, righteousness cannot be through the Law, otherwise there would have been no need for Christ’s atoning death. In Gal 3:11-12, no one is justified before God by the Law, since this would contradict the teaching of Hab 2:5 that righteousness is by faith, and the Law is not based on faith, for it offers life only to those who do what it requires, as Lev 18:5 makes clear. The contrast between *faith* and *doing* is evident here. The Law is based on the principle of being righteous by *doing*, which stands in contrast with the principle of being righteous by *faith*. This is significant, for in Rom 2:13 Paul speaks of “the doers of the Law” (οἱ ποιηταὶ νόμου) which is an allusion to the Lev 18:5 principle that “the one who has done (ὁ ποιήσας) the things [commanded by the Law] shall live by them” (translation mine). The differences

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169-74; Stephen Westerholm, *Perspectives Old and New on Paul: The “Lutheran” Paul and His Critics* (Grand Rapids: Eerdmans, 2004), 313-21.

between the nominative, masculine, singular aorist participle (*ό ποιήσας*) and the plural noun (*ποιηταί*) are syntactical only; at the level of semantic denotation, they are practically interchangeable. This semantic congruence between Gal 3:11-12 and Rom 2:13 heightens the apparent contradiction.

But the apparent contradiction is not merely between Rom 2:13 and Galatians. It also exists within the epistle of Romans itself. Let us review the passages in Romans. To begin with there is the statement in Rom 3:20 that “by the works of the Law no flesh will be justified in his sight (*ἐξ ἔργων νόμου οὐ δικαιωθήσεται πᾶσα σὰρξ ἐνώπιον αὐτοῦ*); for through the Law comes the knowledge of sin.” Note that the *οὐ δικαιωθήσεται* of 3:20 stands in direct contradiction to the *δικαιωθήσεται* of 2:13 – it is the exact same verb form (future passive). Thus, there is an apparent contradiction between Rom 2:13 and 3:20.<sup>3</sup>

But the apparent contradiction does not stop at 3:20. Paul repeats this denial of justification by the works of the Law in the very next verse: “But now apart from the Law (*χωρὶς νόμου*) the righteousness of God has been manifested ... even the righteousness of God through faith in Jesus Christ for all those who believe” (3:21-22). This revelation of “righteousness apart from the Law” is remarkably similar to Gal 2:21, where Paul denies that “righteousness comes through the Law.”

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<sup>3</sup> Scholars of all stripes recognize that there is an apparent contradiction between Rom 2:13 and 3:20. E.g., Francis Watson, *Paul, Judaism, and the Gentiles: A Sociological Approach* (SNTSMS 56; Cambridge: Cambridge University Press, 1986), 119; Hendrikus Boers, *The Justification of the Gentiles: Paul's Letter to the Galatians and Romans* (Peabody, Mass.: Hendrickson, 1994), 8; Chris VanLandingham, *Judgment and Justification in Early Judaism and the Apostle Paul* (Peabody, Mass.: Hendrickson, 2006), 225.

A few verses later, Paul makes a climactic conclusion: “Where then is boasting? It is excluded. By what kind of law? Of works? No, but by a law of faith. For we maintain that a person is justified by faith apart from works of the Law ( $\delta\imath\kappa\alpha\iota\omega\theta\sigma\theta\alpha\iota$   $\pi\iota\sigma\tau\epsilon\iota \ddot{\alpha}n\theta\rho\omega\pi\omega\chi\omega\rho\dot{\iota}\varsigma \ddot{\epsilon}r\gamma\omega\eta\upsilon\mu\omega\nu$ )” (3:27-28). In other words, justification comes by faith alone, not by doing what the Law requires. Paul reinforces this conclusion in the following chapter by appealing to Abraham as the paradigmatic example of justification by faith apart from doing what the Law requires. In contrast with the principle of works, in which the reward is given not as a favor but as what is due, Abraham is the paradigm of “the one who does not work, but believes in him who justifies the ungodly” and who is thus reckoned as righteous by faith (Rom 4:4-5).

The above survey is not exhaustive, but it sufficiently highlights the apparent conflict. On the one hand, we have one isolated verse which seems to teach that “the doers of the Law will be justified.” On the other hand, we have many statements in Romans and Galatians to the effect that “by the works of the Law no flesh will be justified before God.” And the apparent conflict is not only between Romans and Galatians, but within Romans itself.

## VARIOUS RESPONSES

In the face of this apparent conflict, scholars have responded in a variety of ways. Their responses can be subdivided into two main categories. The first response has been to say that Paul is simply not a coherent thinker. The most well-known representative of this approach is Heikki Räisänen who claims that Paul’s teaching on the Law is riddled with inconsistencies. With regard to Rom 2:12-16 in particular, Räisänen sees this

paragraph as standing in “flat contradiction” to the Paul’s main thesis in Rom 1:18–3:20 that all are under sin and that there is none who does good.<sup>4</sup> Likewise, E. P. Sanders thinks that in Rom 2 Paul has taken over homiletical material from Diaspora Judaism without assimilating its content into his own thinking, with the result that what is said here “cannot be harmonized” with his teaching elsewhere.<sup>5</sup> This approach of charging Paul with inconsistency has not been generally persuasive to NT scholars. I do not think this is because they are unwilling to entertain the possibility of inconsistency in Paul’s thought, but because the inconsistency in this case would be “altogether too colossal and too glaring.”<sup>6</sup> Since most scholars are unwilling to attribute such a colossal contradiction to Paul, the tendency has been to gravitate toward the second type of response – attempting to harmonize Rom 2:13 with Paul’s other teaching. The harmonizing approach can be accomplished in one of two ways, generally speaking.

## The Hypothetical View

The first (harmonizing) approach is to take Rom 2:13 as hypothetical, that is, as setting forth the standard that no one actually meets. This approach has the strength of taking seriously the flow of Paul’s argument in the broader context of Rom 1-4. Paul himself states in Rom 3:9-10, 23 that no one actually does meet the standard of Rom

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<sup>4</sup> Heikki Räisänen, *Paul and the Law* (Philadelphia: Fortress, 1983), 101-3.

<sup>5</sup> E. P. Sanders, *Paul, the Law, and the Jewish People* (Minneapolis: Fortress, 1983), 123.

<sup>6</sup> C. E. B. Cranfield, *A Critical and Exegetical Commentary on the Epistle to the Romans* (Edinburgh: T. & T. Clark, 1975), 1.152. Similarly Michael F. Bird questions whether Paul would make “so great a blunder in such a short section.” *The Saving Righteousness of God: Studies in Paul, Justification and the New Perspective* (PBM; Milton Keynes, U.K.; Waynesboro, Ga.: Paternoster, 2007), 158-59.

2:13, thus requiring an unexpected means of attaining the status of righteousness, namely, by faith in Christ on the basis of his atoning death and resurrection. This is the view I will be arguing for in this paper. It is the majority view in traditional Reformed and evangelical interpretation.<sup>7</sup> Although it seems to have fallen out of favor with the advent of the New Perspective, the hypothetical view is not merely adopted out of desperation on dogmatic grounds and has been defended on internal, exegetical grounds by many responsible NT scholars.<sup>8</sup>

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<sup>7</sup> John Calvin, *The Epistles of Paul the Apostle to the Romans and to the Thessalonians* (trans. Ross MacKenzie; ed. D. W. Torrance and T. F. Torrance; Grand Rapids: Eerdmans, 1960), 45-50; idem, *Institutes of the Christian Religion* (LCC; ed. John T. McNeill; trans. Ford Lewis Battles; Philadelphia: Westminster, 1960), III.xi.15 and III.xvii.13; Robert Haldane, *Commentary on Romans* (New York: R. Carter & Brothers, 1853; repr. Grand Rapids: Kregel, 1988), 96-98; Charles Hodge, *A Commentary on Romans* (1835; rev. 1864; repr. Carlisle, Pa.: Banner of Truth, 1972), 53-57; William G. T. Shedd, *A Critical and Doctrinal Commentary upon the Epistle of St. Paul to the Romans* (New York: Charles Scribner's Sons, 1879), 38-39, 44-47, 58, 71-74; H. A. W. Meyer, *Critical and Exegetical Handbook to the Epistle to the Romans* (trans. John C. Moore, Edwin Johnson, and William P. Dickson; New York: Funk & Wagnalls, 1884), 90, 127; Geerhardus Vos, "The Alleged Legalism in Paul's Doctrine of Justification," in *Redemptive History and Biblical Interpretation: The Shorter Writings of Geerhardus Vos* (ed. Richard B. Gaffin, Jr.; Phillipsburg, N.J.: Presbyterian and Reformed, 1980), 393-94; John Murray, *The Epistle to the Romans* (NICNT; Grand Rapids: Eerdmans, 1968), 1.107; F. F. Bruce, *The Letter of Paul to the Romans* (2<sup>nd</sup> ed.; TNTC; Grand Rapids: Eerdmans, 1985), 85-86; Leon Morris, *The Epistle to the Romans* (PNTC; Grand Rapids: Eerdmans, 1988), 123-29; John R. W. Stott, *The Message of Romans: God's Good News for the World* (BST; Downers Grove, Ill.: Inter-Varsity, 1994), 85-89; Robert H. Mounce, *Romans* (NAC 27; Nashville: Broadman & Holman, 1995), 94; Cornelis P. Venema, *The Gospel of Free Acceptance in Christ: An Assessment of the Reformation and New Perspectives on Paul* (Edinburgh: Banner of Truth, 2006), 257-92.

<sup>8</sup> Jean-Noël Alletti, "Rm 1,18–3,20. Incohérence ou cohérence de l'argumentation paulinienne?" *Bib* 69 (1988): 54-61; Richard H. Bell, *No One Seeks for God: An Exegetical and Theological Study of Romans 1.18–3.20* (WUNT 106; Tübingen: Mohr, 1998); Ernest Best, *The Letter of Paul to the Romans* (CBC; Cambridge: Cambridge University Press, 1967), 27-29; Matthew Black, *Romans* (NCB; Grand Rapids: Eerdmans, 1973), 46-49; Byrne,

Before moving on to the second harmonistic approach, I would like to offer a note on nomenclature. Many, I suspect, are stumbled by the word “hypothetical” because it seems to imply that the whole passage is being taken as merely hypothetical, as if Paul is later going to set aside the concept of divine judgment as totally irrelevant. N. T. Wright pejoratively characterizes the hypothetical view as claiming that Paul “is holding up a mirage that will disappear when the argument is complete,” or that he is “leading his readers ... up the garden path.”<sup>9</sup> The implication seems to be that the hypothetical view regards this passage as nothing more than a rhetorical trick. Wright seems to be working with a certain definition of “hypothesis,” such as “tentative assumption,” “conjecture,” or “concession made for the sake of argument.”<sup>10</sup> But these are not the only meanings of “hypothesis” and “hypothetical.” A “hypothesis” can also be “the antecedent clause of a

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*Romans*, 89-90, 117-18; Das, *Paul*, 189-90; Timo Eskola, *Theodicy and Predestination in Pauline Soteriology* (WUNT 100; Tübingen: Mohr [Siebeck], 1998), 133-35; John Knox, *The Epistle to the Romans* (IB; New York: Abingdon, 1954), 9.408-9, 418; Otto Kuss, *Der Römerbrief* (Regensberg: Verlag Friedrich Pustet, 1957), 64-72; Hans Lietzmann, *Die Briefe des Apostels Paulus: An die Römer* (2<sup>nd</sup> ed.; HNT; Tübingen: Mohr [Siebeck], 1919), 38; Andrew T. Lincoln, “From Wrath to Justification: Tradition, Gospel, and Audience in the Theology of Romans 1:18–4:25,” in *Pauline Theology, Vol. III: Romans* (ed. David M. Hay and E. Elizabeth Johnson; Minneapolis: Fortress, 1995), 141-6; Moo, *Romans*, 140-57, 211; Frank Thielman, *From Plight to Solution: A Jewish Framework to Understanding Paul’s View of the Law in Galatians and Romans* (NovTSup 61; Leiden: Brill, 1989), 92-96; Francis Watson, *Paul and the Hermeneutics of Faith* (London: T. & T. Clark, 2004), 352 n. 57; Westerholm, *Perspectives*, 267-72, 388; Ulrich Wilckens, *Der Brief an die Römer* (EKKNT 6; Zürich: Benziger, 1978), 1.130-31, 145-46, 174-75; Sungchul Ye, *Paul, the Doers of the Law, and Gentiles: A Study of Romans 2:12-16* (Ph.D. dissertation, Fuller Theological Seminary, 2004); John Ziesler, *Paul’s Letter to the Romans* (TPINTC; London: SCM Press; Philadelphia: Trinity Press International, 1989), 82-89.

<sup>9</sup> Wright, *The Letter to the Romans*, in *The New Interpreter’s Bible*, vol. 10 (ed. Leander E. Keck; Nashville: Abingdon, 2002), 441.

<sup>10</sup> Merriam-Webster’s Collegiate Dictionary (10<sup>th</sup> ed.; Springfield, Mass.: Merriam-Webster, 1996), 572.

conditional statement,” a meaning that fits the present case quite well.<sup>11</sup> Applied to Rom 2:13 I would paraphrase the verse in the following way, so as to bring to the fore its implicitly conditional character: “If people do the Law, they will be justified.” The hypothetical interpretation claims that the verse contains an implicit condition, but that, as the rest of Paul’s argument will show, no one among fallen Adamic humanity actually meets the condition. The fact that there will be a final judgment is far from being merely conjectural or a mirage. Nevertheless, the standard for achieving justification at the judgment by works is so high (only “the doers of the Law will be justified”), that it turns out, as a matter of empirical fact, to be an empty set, as Paul declares: “There is none righteous, no not one ... all have sinned and fall short of the glory of God” (Rom 3:10, 23). Thus, the meaning of “hypothetical” is narrowly circumscribed in that it focuses on the idea that there is no one who meets the implicit condition that one must fully keep the Law to be justified by that means. Noted evangelical preacher John Stott provides a good example of this usage of “hypothetical” when he says of Rom 2:13, “This is a theoretical or hypothetical statement, of course, *since no human being has ever fully obeyed the law* (*cf.* 3:20).”<sup>12</sup> Perhaps a case could be made for renaming it “the empty-set view,” but the traditional label is commonly used in the literature and accurately describes the view.

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<sup>11</sup> Ibid.

<sup>12</sup> Stott, 86 (emphasis mine). Hereafter, all references to Romans commentaries (subsequent to the initial, full bibliographic reference) will be to the commentator’s last name only. Of course, some commentators like Dunn, Moo, and Wright have written other books and articles in addition to their Romans commentary, but I will refer to these other writings with a short title to differentiate.

## Non-Hypothetical Views

The second way to harmonize Rom 2:13 with Paul's denial of justification by works is to take "the doers of the Law" in a positive sense as referring to genuine but imperfect obedience on the part of those who strive to be obedient to God, whether they do so in terms of explicit faith in Christ or in terms of their response to God's moral standards as revealed in creation and conscience. Taken in this way "the doers of the Law" does not denote the same thing as "the works of the Law," which is a negative phrase for Paul.<sup>13</sup> Those who take this approach acknowledge that Paul denies justification by "the works of the Law," as we have seen (Gal 2:16; Rom 3:20, 28). Thus, the apparent contradiction is eliminated by taking "the doers of the Law" in a positive sense and "the works of the Law" in a negative sense.

As I mentioned, this second approach comes in several varieties, two of which stand out and vie for attention: (2a) some argue that Gentile Christians are in view in 2:13-15; (2b) others do not see any hint of salvific transformation in terms of a faith-response to Christ in this paragraph and think that it is non-Christian (or pre-Christian) Gentiles that Paul has in mind here, that is, Gentiles *qua* Gentiles, who are responding to the light that they have. A frequently-cited defender of option 2b is Klyne Snodgrass, and it appears to be a minority viewpoint.<sup>14</sup> The more popular view is option 2a. On this

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<sup>13</sup> James D. G. Dunn, *Romans 1–8* (WBC 38A; Dallas: Word Books, 1988), 101, 153, 158; Watson, *Paul, Judaism, and the Gentiles*, 119; Boers, *Justification of the Gentiles*, 105; idem, "'We Who are by Inheritance Jews; Not from the Gentiles, Sinners,'" *JBL* 111 (1992): 273-81.

<sup>14</sup> Klyne R. Snodgrass, "Justification by Grace – to the Doers: An Analysis of the Place of Romans 2 in the Theology of Paul," *NTS* 32 (1986): 72-93. See also Räisänen, *Paul and the Law*, 105-9; Glenn Davies, *Faith and Obedience in Romans: A Study in Romans 1–4* (JSNTSS 39; Sheffield: JSOT Press, 1990), 60-67; Bruce W. Longenecker, *Eschatology and the Covenant: A Comparison of 4 Ezra and Romans 1–11* (JSNTSS 57; Sheffield: JSOT

view, “the doers of the Law” is a reference to the obedience of faith, that is, the “fulfillment of the Law” by Christians by means of the Spirit (Rom 8:4; 13:8-10; Gal 5:14). This view was first articulated by Augustine in the context of his polemics with Pelagius.<sup>15</sup> It is currently gaining ground among both opponents and advocates of the New Perspective on Paul (NPP) – as evidenced, for example, by Simon Gathercole (a critic of the NPP) and N. T. Wright (an advocate of the NPP) – and has been advocated by many other scholars from a variety of theological perspectives.<sup>16</sup>

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Press, 1991), 185-89. Douglas Moo provides a good critique of this view in “Romans 2: Saved Apart from the Gospel?” in *Through No Fault of Their Own: The Fate of Those Who Have Never Heard* (ed. William V. Crockett and James G. Sigountos; Grand Rapids, Baker, 1991), 137-45.

<sup>15</sup> Augustine, “On the Spirit and the Letter,” *NPNF<sup>1</sup>* 5.101-4.

<sup>16</sup> Simon Gathercole, “A Law unto Themselves: The Gentiles in Romans 2.14-15 Revisited,” *JSNT* 85 (2002): 27-49; N. T. Wright, “The Law in Romans 2,” in *Paul and the Mosaic Law* (ed. J. D. G. Dunn; Tübingen: Mohr [Siebeck], 1996; Grand Rapids: Eerdmans, 2000), 131-50; idem, *The Letter to the Romans*, 440-43. Also: Karl Barth, *A Shorter Commentary on Romans* (Richmond: John Knox Press, 1959), 35-39; Jonathan Bayes, *The Weakness of the Law* (PBTM; Carlisle, U.K.: Paternoster, 2000), 103-7; Roland Bergmeier, *Das Gesetz im Römerbrief und andere Studien zum Neuen Testament* (WUNT 121; Tübingen: Mohr [Siebeck], 2000), 53-54; Bird, *Saving Righteousness*, 155-78; Daniel J-S Chae, *Paul as Apostle to the Gentiles* (PBTM; Carlisle, U.K.: Paternoster, 1997), 109-15; Cranfield, *Romans*, 1.153-63; Felix Flückiger, “Die Werke des Gesetzes bei den Heiden (nach Röm 2,14ff),” *TZ* 8 (1952): 17-42; Don B. Garlington, *Faith, Obedience and Perseverance* (WUNT 79; Tübingen: Mohr [Siebeck], 1994), 44-71; Akio Ito, “Romans 2: A Deuteronomistic Reading,” *JSNT* 59 (1995): 21-37; Robert Jewett, *Romans: A Commentary* (Hermeneia; Minneapolis: Fortress, 2007), 210-18; Adrio König, “Gentiles or Gentile Christians? On the Meaning of Romans 2:12-16,” *JTSA* 15 (1976): 53-60; VanLandingham, *Judgment and Justification*, 215-32; Wilhelm Mundle, “Zur Auslegung von Röm 2,13ff,” *Theologische Blätter* 13 (1934): 249-56; Josef B. Souček, “Zur Exegese von Röm. 2,14ff,” in *Antwort: Karl Barth zum siebzigsten Geburtstag am 10. Mai 1956* (ed. E. Wolf; Zollikon-Zürich: Evangelischer Verlag, 1956), 99-113; Francis Watson, *Paul, Judaism, and the Gentiles*, 115-22 (N.B.: Watson recently switched to the hypothetical view, as he indicates in *Paul and the Hermeneutics of Faith*, 352 n. 57).

Within option 2a there is a rare sub-view that must be mentioned for the sake of completeness. On this view, the tension between Rom 2:13 and 3:20 is not only eased by viewing taking “works of the Law” in a negative sense, but also by adopting a different definition of the verb δικαιόω, namely, to make ontologically righteous. Thus initial justification in Paul refers to being made intrinsically righteous by the Spirit’s work of bringing about deliverance from the power of sin. It refers to the spiritual transformation that occurs at conversion when a person is transferred from the realm of sin/flesh and brought under the life-changing sway of the Spirit, thus becoming an inherently righteous person. On this view, the statement that “no flesh will be justified (or made righteous) by the works of the Law” (Rom 3:20) is understood to mean that no one who is under the dominion of the flesh can effect such a change by attempting to keep the Law. Rom 2:13 uses δικαιόω in a slightly different sense to refer to the future vindication of one’s Spirit-wrought righteousness. There is thus no conflict, since the term δικαιόω has been radically misunderstood by Protestant interpreters.<sup>17</sup> This view seems to have few advocates. More frequently, scholars who hold to a real, non-hypothetical interpretation of Rom 2:13 do not explicitly deal with the meaning of δικαιόω but typically use glosses such as “acquittal”<sup>18</sup> or “vindication”<sup>19</sup> at the final judgment.

I also want to briefly describe the views of James D. G. Dunn. He does not hold to the hypothetical view and falls somewhere within the broad category of the second view,

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<sup>17</sup> Charles H. Cosgrove, “Justification in Paul: A Linguistic and Theological Reflection,” *JBL* 106 (1987): 653-70; VanLandingham, *Judgment and Justification*, 242-332.

<sup>18</sup> Dunn, *The New Perspective on Paul: Collected Essays* (WUNT 185; Tübingen: Mohr [Siebeck], 2005), 65, 396, 419; Wright, “The Law in Romans 2,” 144.

<sup>19</sup> Gathercole, “A Law unto Themselves,” 48; Wright, “The Law in Romans 2,” 148.

but identifying with neither view 2a nor 2b. On the one hand, in his commentary on Romans he clearly rejects view 2a, arguing against the identification of the Gentiles of vv 14-15 as Gentile Christians.<sup>20</sup> His main argument is that the Gentiles cannot be Christians, since they are said to “do by nature the things of the Law” (Rom 2:14). If they were Christians one would expect Paul to say that they do the things of the Law by the Spirit. On the other hand, Dunn does not go so far as Snodgrass, who thinks that non-Christian Gentiles can be saved by living obediently in response to the light that they have. Dunn comes close to suggesting this but pulls back, concluding that Paul leaves the question open.<sup>21</sup> In recent writings, Dunn seems to have inched closer to the Gentile Christian theory without endorsing it completely. I say this because he now makes frequent appeals to Rom 2:13 to argue for a final justification of the believer based upon good works accomplished in the power of the Spirit.<sup>22</sup> Yet he never explicitly identifies the Gentiles of vv 14-15 as Gentile Christians. I suspect we must allow for the possibility that Dunn draws a line between v 13 (Christians) and vv 14-15 (non-Christians).

Here is a summary of the various scholarly responses to the apparent contradiction:

- A. Paul isn't coherent
- B. Paul is coherent
  - (1) Rom 2:13 is hypothetical (an empty set)
  - (2) “Doers of the Law” (positive) ≠ “works of the Law” (negative)
    - (a) Gentile Christians
    - (b) Non-Christian Gentiles

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<sup>20</sup> Dunn, 1.98-100, 106-7.

<sup>21</sup> Ibid., 1.107.

<sup>22</sup> Dunn, *The Theology of Paul the Apostle* (Grand Rapids: Eerdmans, 1998), 365, 386, 467, 488, 491; idem, *The New Perspective on Paul: Collected Essays*, 63-80, 395-96, 419-21, 460.

We have looked at the problem and surveyed the various responses to it. At this point we need to do an exegesis of Rom 2:12-16. Of course, I cannot deal exhaustively with every exegetical question, but I will try to give a competent exegesis in order to help us get a sense of the flow of Paul's argument here. After I have done the exegetical spadework defending the hypothetical interpretation, I will respond to seven objections that have been raised against it. I hope that by attempting to answer these seven objections the strength of the hypothetical view will become more evident. Then I will present five problems, as I see it, with the leading non-hypothetical view, namely, the view that Paul is speaking of Gentile Christians (view B2a). I will not engage the view that Paul is incoherent (view A), or the view that Paul is describing non-Christian Gentiles (view B2b), since these views have not been widely accepted. It seems to me that the debate centers on two rival views: the hypothetical view (view B1) versus the Gentile Christian view (view B2a).

#### CONTEXT (ROM 1-4)

The most important exegetical observation about Rom 2:13 is that it is set within a broader argumentative context. Although it would be going too far afield to attempt to provide a detailed outline of Romans, almost all scholars agree that Romans 1:16-17 states the theme of the epistle,<sup>23</sup> which is then expounded in the subsequent chapters, at

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<sup>23</sup> Paul J. Achtemeier, *Romans* (IBC; Atlanta: John Knox, 1985), 35-36; C. K. Barrett, *The Epistle to the Romans* (BNTC; Peabody, Mass.: Hendrickson, 1991), 27; Byrne, 51; Cranfield, 1.87; Dunn, 1.36-37; Jewett, 135; Ernst Käsemann, *Commentary on Romans* (trans. Geoffrey W. Bromiley; Grand Rapids: Eerdmans, 1980), 21-22; Leander E. Keck, *Romans* (ANTC; Nashville: Abingdon, 2005), 50; Moo, 63; Murray, 1.26; William Sanday and Arthur C. Headlam, *A Critical and Exegetical Commentary on the Epistle to the Romans* (5<sup>th</sup> ed.; Edinburgh: T. & T.

least through the end of chapter 4, but arguably beyond that to the end of chapter 11.<sup>24</sup> In spite of Dodd's view that Rom 9-11 is an appendix, most scholars now recognize that all of Romans 1-11 is actually one long argument, however necessary it may be to subdivide it (typically chs. 1-4, 5-8, 9-11). For our purposes here, it is only necessary to see chapters 1-4 as a continuous argument. Paul's argument in these opening chapters may be outlined as follows:

- 1:16-17 Thesis: The Gospel reveals “the righteousness of God”
  - 1:18–3:20 Universal unrighteousness
    - 1:18-32 Pagans under God’s wrath
    - 2:1-16 Impartiality of God’s eschatological judgment
    - 2:17–3:8 The Jews have no (soteriological) advantage
    - 3:9-20 Conclusion: there is none righteous
  - 3:21-31 The revelation of “the righteousness of God” in the cross
  - 4:1-25 Scripture proof – Abraham was justified by faith apart from the Law

The seemingly diverse material in 1:18–3:20 forms a unit that is surrounded on both sides by an inclusio pertaining to the theme of the revelation of “the righteousness of God.” Romans 1:16-17 and 3:21-22 form the two bookends of the inclusio. In 1:17 Paul says that in the gospel “the righteousness of God is revealed from faith to faith, as it is written, ‘But the righteous person shall live by faith’” ( $\delta\imath\kappa\alpha\iota\sigma\acute{\nu}\eta\ \gamma\grave{a}\rho\ \theta\epsilon\bar{o}\bar{u}\ \acute{e}v\ \alpha\acute{u}\tau\bar{\omega}$   $\acute{\alpha}\pi\kappa\alpha\lambda\acute{u}\pi\tau\bar{\epsilon}\tau\alpha\iota\ \acute{e}\kappa\ \pi\acute{i}\sigma\tau\epsilon\omega\varsigma\ \epsilon\iota\varsigma\ \pi\acute{i}\sigma\tau\iota\varsigma\$ ,  $\kappa\alpha\theta\grave{\omega}\varsigma\ \gamma\acute{e}\gamma\bar{r}\alpha\pi\tau\bar{\epsilon}\iota\$ , ‘Ο δὲ δίκαιος ἐκ πίστεως ζήσεται'). Likewise, in 3:21-22, after concluding that “by the works of the Law no flesh will be justified in His sight” (3:20), he jubilantly proclaims, “But now, apart from the Law, the righteousness of God has been manifested ... even the righteousness of God through faith in Jesus Christ for all those who believe” (Νυνὶ δὲ χωρὶς νόμου

Clark, 1902), 22; Schreiner, 56-8; Peter Stuhlmacher, *Paul's Letter to the Romans: A Commentary* (trans. Scott J. Hafemann; Edinburgh: T. & T. Clark, 1994), 28-29; Wright, 423.

<sup>24</sup> Fitzmyer, 253.

δικαιοσύνη θεοῦ πεφανέρωται ... δικαιοσύνη δὲ θεοῦ διὰ πίστεως Ἰησοῦ Χριστοῦ,  
εἰς πάντας τοὺς πιστεύοντας).

In view of the immense amount of scholarly discussion surrounding “the righteousness of God” in Romans, I can only touch on it very briefly here. I take “the righteousness of God” in Rom 1:17; 3:21-22 to have one of two possible meanings. Either δικαιοσύνη θεοῦ can denote “the gift of righteousness,” mentioned later in Rom 5:17, and which is thus contextually defined as the righteousness of Christ applied to the sinner by a judicial reckoning and received by faith, or it refers to God’s own attribute of righteousness as fleshed out in Rom 3:25-26. If the second option is adopted, “the righteousness of God” must still be interpreted as including a reference to God’s justifying activity, since the phrase focuses on the fact that God justifies in a manner that is consistent with his righteousness on the basis of Christ’s propitiatory sacrifice. Either way, “the righteousness of God” involves the activity of God in bringing those who have faith to the legal status of being δίκαιος before God and thus qualified for eternal life.<sup>25</sup>

Having looked at the two bookends that surround 1:18–3:20, we must now ask what is the function of 1:18–3:20 in terms of those bookends. It is not hard to see that this section builds up to the conclusion stated in 3:9-20: “What then? Are we better than they? Not at all; for we have already charged that both Jews and Greeks are all under sin; as it is written, ‘There is none righteous (δίκαιος), not even one ....’ Because by the works of the Law no flesh will be justified (δικαιωθήσεται) in His sight; for through the Law comes the knowledge of sin.”<sup>26</sup> In other words, 1:18–3:20 is a subordinate argument

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<sup>25</sup> Westerholm, *Perspectives*, 285-86.

<sup>26</sup> Rom 3:20 is widely recognized as the conclusion of 1:18–3:20. Dunn, 1.145-6.

within the larger argument concerning the revelation of the righteousness of God in Christ.<sup>27</sup> The function of the subordinate argument is to demonstrate humankind's status of universal unrighteousness, leading to the conclusion that no one can be declared righteous by observing the Law. This, in turn, sets the stage for the revelation of God's salvific activity in Christ of providing righteousness for the unrighteous. Jeffrey Lamp puts it well: "In 1:18–3:20, Paul is concerned to establish the foundation for his exposition of 'justification by faith,' which follows in 3:21–4:25. This foundation is essentially that both Jews and Gentiles stand in need of the redemptive work of Christ as appropriated by faith."<sup>28</sup>

Note as well the statement at 3:9: "We have previously made the charge (*προηγιασάμεθα*) that both Jews and Greeks are all under sin." This is highly significant because it is Paul's own statement about what he was driving at in the preceding paragraphs (1:18–3:8).<sup>29</sup> The verb *αἰτιάομαι* (< *αἰτία*, accusation) means "to accuse, to allege by way of accusation" (LSJ). By adding the prefix *προ-* Paul is making clear that this is what he "previously" did. Paul uses the prefix *προ-* before verbs of saying several times in his epistles to refer back to something he had written earlier in the epistle (*προείρηκα* [2 Cor 7:3]; *προείρηκα καὶ προλέγω* [2 Cor 13:2]; *προειρήκαμεν* [Gal 1:9]; *προλέγω ... καθὼς προεῖπον* [Gal 5:21]; *προέγραψα* [Eph 3:3]), although in a few cases

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<sup>27</sup> Rom 1:18–3:20 is a "long prophetic accusation" (Byrne, 79, 119), Paul's "preparation for the gospel" (Moo, 148), and "preliminary to the main point" (Moo, 218).

<sup>28</sup> Jeffrey S. Lamp, "Paul, the Law, Jews, and Gentiles: A Contextual and Exegetical Reading of Romans 2:12–16," *JETS* 42 (1999): 38.

<sup>29</sup> Barrett, 65; Byrne, 116; Dunn, 1.148, 156; Meyer, 122; Moo, 201; Schreiner, 164; Stott, 99; Ziesler, 102.

it refers to something he had said in oral teaching prior to writing the epistle (*προελέγομεν* [1 Thess 3:4]; *προείπαμεν* [1 Thess 4:6]). In this case, it is clearly the former, since Paul had never before visited or written to the church at Rome (Rom 1:13; 15:22-33). Thus, here it should be translated “we have already made the charge that ...” (NIV; BDAG). This is Paul’s own summary of what he had been doing in Rom 1:18–3:8.

Note that the summary charge in 3:9 includes both Jews and Greeks (Gentiles) as alike under sin (*Ιουδαίους τε καὶ Ἑλληνας πάντας ὑφ' ἀμαρτίαν*). Regardless of the positive statements about hypothetically or intermittently obedient Gentiles in chapter 2, these statements are not for the purpose of vindicating some Gentiles from the charge of sin, but for the purpose of condemning them, along with the Jews, so that “*all* are under sin” (*πάντας ὑφ' ἀμαρτίαν εἶναι*, 3:9), “for there is no distinction (*οὐ γάρ ἐστιν διαστολή*); for all have sinned and fall short of the glory of God” (3:22-23). It is easy to lose the thread of the argument in 1:18–3:8, especially 2:1–3:8. There are several detours and sub-arguments in this section. But the significance of *προητιασάμεθα* in 3:9 is that, in case we lost the thread of the argument, Paul now steps back and takes provides his own summary of what he had been driving at.

Having gotten our bearings by looking at the broad context (Rom 1-4), we must now begin to zero in on our text by looking at the immediately preceding context (Rom 2:6-11). In the paragraph just prior to 2:12-16, Paul appeals to the principle of divine judgment. Verse 6 (“who will render to each person according to their deeds”) uses language practically identical to LXX Ps 61:13 and Prov 24:12. The reason Paul does not explicitly introduce the reference with a scriptural quotation formula is that it was a

widely accepted principle in Judaism.<sup>30</sup> He then shows in the next few verses what this means in terms of eschatological judgment. Those who do good will receive eternal life. Those who do evil will receive divine retribution, “wrath and indignation.” He adds in v 11 that this is so because of the impartiality of God: “for there is no partiality (προσωπολημψία) with God.”<sup>31</sup> We can summarize this paragraph in the following way:

v 6: “God will render to each person according to their deeds”

vv 7-10: Jews and Gentiles alike:

Those who do good → eternal life

Those who commit evil → wrath

v 11: “For there is no partiality (προσωπολημψία) with God”

In view of the broader context that we have been examining in chapters 1-4, I would argue that Paul is not – at this stage in his argument – describing real people. He is not saying that there will be people who do good and who, on that basis, obtain eternal life. For Paul to say this would conflict with his own conclusion in 3:9-10 that all, both Jews and Greeks, are alike under the power of sin and that there is none righteous, no not one.

Furthermore, it would conflict with Paul’s teaching elsewhere about the necessity of faith in Christ in order to escape the eschatological outpouring of divine wrath. For if we take the positive statements in v 7 (“to those who by perseverance in doing good seek for glory and honor and immortality, [he will give] eternal life”) and v 10 (“glory and

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<sup>30</sup> So Jewett, 204 and Kent L. Yinger, *Paul, Judaism, and Judgment According to Deeds* (SNTSMS 105; Cambridge: Cambridge University Press, 1999), 157. See 1QS 10.16-18; 1QH 23(18).12-13; 1QpHab 8.1-2; 2 Esd (4 Ezra) 6:19; 7:17, 33-35; Sir 16:12-14; Pss. Sol. 2:16-18, 33-35; 9:4-5; 17:8-9; 2 Bar. 13:8; 44:4; 54:21; Jub. 5:13-19; 21:4; 33:18; T. Levi 3:2; 4:1-2; T. Gad 7:4-5; T. Benj. 10:7-9; 1 En. 1:7-9; 100:7; T. Mos. 12:10-11; Sib. Or. 4:183-85; Jos. Asen. 28:3; L.A.B. 3:10.

<sup>31</sup> Jouette M. Bassler, *Divine Impartiality: Paul and a Theological Axiom* (SBLDS 59; Chico: Scholars Press, 1982).

honor and peace to everyone who does good, *to the Jew first and also to the Greek*") as denoting actual individuals, then any Jews and Gentiles who have not responded in faith to the message of the gospel but who have lived moral lives would be saved. But Paul elsewhere, and the NT generally, proclaims the necessity of faith in Christ for salvation.

Conversely, the negative side of the equation (vv 8-9), if taken as envisioning real people rather than as setting forth the principle of divine judgment, would come into conflict with Paul's teaching in the next chapter concerning the fact that Abraham and David were justified in spite of having committed sins. The negative statements of vv 8-9 do not contain any provision for forgiveness for those who have committed sins. Paul states in black-and-white terms that God's wrath will come upon "*every* soul who does evil." There is no basis in the immediate context for limiting "*every*" in such a way that it would exclude Abraham and David, whom Paul speaks of as "ungodly" and as having committed transgression (Rom 4:4-8).

Thus, it is more likely that in this paragraph Paul is setting forth the principles of divine judgment, rather than describing what he thinks the actual outcome will be at the last day. Because of the reality of human fallenness, Paul does not think that there will actually be any at the last day who have done only good and nothing but good. But because of the unexpected provision of atonement and righteousness in Christ, he thinks that some of those who have not perfectly persisted in doing good will escape God's wrath and receive eternal life on the basis of God's grace in Christ. But this is to get ahead of Paul's argument. At this stage, he is only setting forth the principle that God's judgment will be utterly impartial. This is needed because he is aware that the Jews do not think that they will be judged on the same level with the idolatrous and immoral

Gentiles. The Jews think that because they have been circumcised and have received the Law (God's instruction for morality), they will not be judged along with the pagans but will have an advantage at the last day – namely, their possession of the Law as well as their imperfect but (relatively) faithful Law observance.<sup>32</sup> It is this presumption that Paul attacks by setting forth the rigorous and impartial nature of God's judgment. Only those characterized by an unwavering “perseverance in doing good” (*ὑπομονὴ ἔργου ἀγαθοῦ*) will obtain eternal life, and this principle applies with equal rigor to the Jew as well as to the Greek. The theme of divine impartiality in judgment is intended to show that the Jews have no advantage over the Gentiles.

#### EXEGESIS OF ROM 2:12-16

We have looked at the broader and narrower context of Rom 2:13. It is now time to exegete the paragraph in which this verse is set. I begin by offering my translation of the paragraph. I will then proceed to exegete it verse-by-verse.

<sup>12</sup>For all who have sinned apart from the Law will also perish apart from the Law, and all who have sinned under the Law will be condemned by the Law (<sup>13</sup>for it is not the hearers of the Law who are just before God, but the doers of the Law will be justified; <sup>14</sup>for whenever Gentiles who do not have the Law by nature do what the Law requires, these, though not having the Law, are a law to themselves, <sup>15</sup>in that they show the function of the Law written in their hearts, as their conscience bears witness and their conflicting thoughts accuse or even defend themselves) <sup>16</sup>on the day when God judges the secrets of humans through Christ Jesus – as my gospel declares.

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<sup>32</sup> George P. Carras, “Romans 2,1-29: A Dialogue on Jewish Ideals,” *Bib* 73 (1992): 183-207.

## Verse 12

As we have seen, the preceding paragraph was Paul's statement of the principle of God's impartial judgment, summarized in the verse just prior to the paragraph now before us: "For there is no partiality ( $\pi\tau\sigma\omega\pi\lambda\eta\mu\gamma\alpha$ ) with God" (v 11). It is to support this conclusion that Rom 2:12-16 is written. The introductory "for" ( $\gamma\alpha\rho$ ) of v 12 indicates that the statement in v 12 is given to provide support for the impartiality principle in v 11. The statement which provides that support is: "For all who have sinned apart from the Law will also perish apart from the Law, and all who have sinned under the Law will be condemned by the Law" (v 12). It is obvious that those "who have sinned apart from the Law" are Gentiles, and those "who have sinned under the Law" are Jews.<sup>33</sup>

I have translated the second half of v 12, "all who have sinned under the Law will be *condemned* ( $\kappa\tau\iota\theta\gamma\sigma\sigma\tau\alpha\iota$ ) by the Law." Although the verb is typically translated "judged," the translation "condemned" provides a better sense here, since Paul is not concerned with God's activity of bringing human deeds under review in order to determine who has or has not sinned, but with God's activity, once that review has taken place, of condemning those who have sinned. Although the verb usually used to denote unfavorable judgment or condemnation is  $\kappa\alpha\tau\alpha\kappa\gamma\iota\omega$  (cp. Rom 2:1; 8:3, 34; 14:23; 1 Cor 11:32), Paul does occasionally employ the simple verb  $\kappa\gamma\iota\omega$  with the meaning "to pass an unfavorable judgment upon, to condemn" (Rom 2:1 [3x], 3; 3:7; 14:3, 4, 10, 13, 22; 1 Cor 4:5; 10:29; Col 2:16).<sup>34</sup> All of these examples are of humans passing unfavorable

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<sup>33</sup> Moo, 145; Wright, 440. This is a "standard Jewish definition," Dunn, 1.95.

<sup>34</sup> BDAG  $\kappa\gamma\iota\omega$  2b. Similarly, "the judgment of God" in Rom 2:2,3 refers "not to the act of judging but the condemnatory sentence." Murray, 1.57-8.

judgment on other humans, but there is one text where Paul uses it negatively with God as the implied subject: “*that they may be condemned* (ἴνα κριθῶσιν) who did not believe the truth, but took pleasure in wickedness” (2 Thess 2:12). Thus, the verb should be translated “will be condemned” here.<sup>35</sup>

### Verse 13

This brings us to the crucial verse that is the focus of this paper: “For it is not the hearers of the Law who are just before God, but the doers of the Law will be justified.” Note that this is our second “for” (γάρ). As with the “for” at the beginning of v 12 which connects v 12 to v 11, this one connects v 13 back to v 12. However, it does not connect to the whole of v 12, but only to v 12b, “all who have sinned under the Law will be condemned by the Law.” Verse 13 provides the reason why all who have sinned under the Law will be condemned. Why will those who sinned under the Law be *condemned* by the Law? Because if you want to be regarded as righteous before God by means of the Law, it is not enough to *hear* the Law; you must actually *do* what it requires.<sup>36</sup> It would appear, then, that Paul presupposes that the Jews have not obeyed the Law. This is not a speculative assumption, for he makes precisely that charge in vv 23-24, 27 (“You who boast in the Law, through your breaking the Law, do you dishonor God? For ‘the name of God is blasphemed among the Gentiles because of you’ ... Though having the letter of the Law and circumcision, [you] are a transgressor of the Law”), culminating in the charge of 3:9 that both Jews and Greeks are alike under sin.

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<sup>35</sup> Byrne, 91; Fitzmyer, 308; Moo, 146; Murray, 1.70; Schreiner, 119; Dunn, 1.96; BDAG κρίνω 5bα.

<sup>36</sup> Moo, 147.

Another important issue that needs to be addressed is the meaning of the verb δικαιωθήσεται. It is best to take the future as a genuine future pointing to the final judgment. At the final judgment God will render a judicial verdict in which those who have obeyed the Law will be accounted as righteous before God. This accounting is forensic in nature as opposed to transformative. In other words, it is a divine recognition that a person is already righteous, not the act of making an unrighteous person righteous. Unlike Paul's usual soteriological usage, this justification involves the divine recognition of a person's actual righteousness as constituted by their doing only the good and always the good. This interpretation is verified by the parallel in v 13a: δίκαιοι παρὰ τῷ Θεῷ ("righteous before God"). Thus, we are not yet dealing with Paul's distinctively Christian concept of justification in which the eschatological verdict has been brought forward into the present in the Christ-event, a verdict received as a gift and apprehended by faith alone. Here, Paul uses justification language entirely within the frame of the Jewish perspective that he has adopted in order to indict both Gentiles and Jews before the bar of divine justice.<sup>37</sup>

#### Verse 14

"For whenever [ὅταν]<sup>38</sup> Gentiles, who do not have the Law by nature, do what the Law requires, these, though not having the Law, are a law to themselves ...."

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<sup>37</sup> Barrett, 48; Fitzmyer, 309.

<sup>38</sup> That ὅταν should be translated "whenever" here is argued by Das, *Paul*, 181; Fitzmyer, 309; Käsemann, 62; Ye, *Paul, the Doers of the Law*, 114-15; and John W. Martens, "Romans 2:14-16: A Stoic Reading," *NTS* 40 (1994): 62-64.

We come now to v 14 which is introduced with our third “for” ( $\gamma\alpha\rho$ ). Like its predecessors, this “for” is designed to provide support for something stated earlier. However, in this case, it links back, not to the immediately preceding verse (v 13) but to v 12a. This is evident because now Paul is no longer talking about the Jews but the Gentiles. “Those who do not have the Law” (v 14) are the same as “all who sinned apart from the Law” (v 12a). The best way to see the logical force of this third “for” is to observe that there is a chiasm in our paragraph:<sup>39</sup>

- A. (v 12a) Gentiles (“all who sinned apart from the Law”)
- B. (v 12b) Jews (“all who sinned under the Law”)
- B.’ (v 13) Jews (“not the hearers of the Law, but the doers of the Law”)
- A.’ (vv 14-15) Gentiles (“who do not have the Law”)

The second “for” (introducing v 13) provides the reason why the Jews will be condemned even though they have the Mosaic Law. One might think that having the Law would protect one from condemnation. Paul says, No, merely having or hearing the Law is not enough; one must actually do what it requires. Since the Jews have not done what the Law requires, they will be condemned in spite of having access to God’s moral standards as revealed in the Law. On the other hand, one might think that not having the Law would give one an excuse at the day of judgment so that the Gentiles would be off the hook. Paul says, No, even the Gentiles have sufficient knowledge of God’s moral requirements, as evidenced in the fact that the Gentiles sometimes do the good things that the Law requires (e.g., not all Gentiles commit murder and adultery all the time). So the third “for” (introducing vv 14-15) provides the reason why the Gentiles will be condemned even though they do *not* have the Mosaic Law. Even though the Gentiles do

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<sup>39</sup> Das, *Paul*, 181; Keck, 78.

not have the written Law of Moses, they have sufficient moral knowledge via something akin to the Law – namely, their conscience.<sup>40</sup>

There is considerable debate over the word φύσει (“by nature”) in the clause that begins v 14: ὅταν γὰρ ἔθνη τὰ μὴ νόμον ἔχοντα φύσει τὰ τοῦ νόμου ποιῶσιν. The question is, What verb does this adverbial dative modify? The first option is to say that it modifies the verb ἔχοντα in which case the clause would be translated: “for when Gentiles, *who do not have the Law by nature*, do what the Law requires ....” The second option is to take it with what follows, so that it modifies the verb ποιῶσιν. In this case the clause would be translated: “for when Gentiles, who do not have the Law, *do by nature what the Law requires ....*” The arguments for each option are finely balanced, and it is hard to decide. Advocates of the Gentile Christian interpretation almost without exception adopt the first view. In fact, they are compelled to do so, since it is unlikely that Paul would speak of Christian obedience as something that occurs “by nature.” Paul usually says Christian obedience is empowered by the Spirit. Advocates of the hypothetical interpretation generally adopt the second view. However, the hypothetical interpretation is compatible with either option, and a few of its advocates adopt the second view on syntactical grounds.<sup>41</sup> Since it is not a decisive issue for the hypothetical interpretation, I will not attempt to decide the question in this paper.

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<sup>40</sup> Byrne, 88; Keck, 80; Schreiner, 119, 124.

<sup>41</sup> Achtemeier, “‘Some Things,’” 255-59; Das, *Paul*, 180 n. 28; Keck, 80-81.

## Verse 15

“... in that they [οἵτινες] show the function of the Law [τὸ ἔργον τοῦ νόμου]  
written in their hearts, as their conscience bears witness and their conflicting thoughts  
accuse or even defend themselves.”

Verse 15 continues the thought of v 14 with the word οἵτινες. The purpose of v 15 is to explain in what sense the Gentiles are “a law unto themselves.” They are a law unto themselves, not in the sense that they are free to do draft their own moral standards as they see fit, but in the sense that they have a divinely in-built monitor, the conscience (ἡ συνειδήσις), which serves a function similar to that of the Mosaic Law,<sup>42</sup> namely, the function of condemning bad behavior and approving the good.

There is significant debate over the phrase “the work of the Law” (τὸ ἔργον τοῦ νόμου). The two main options are:

1. “The work (e.g., conduct) that the Law demands.” On this view the phrase is a collective singular and is equivalent to τὰ τοῦ νόμου in the previous verse (v 14).<sup>43</sup>
2. “The business, effect, or function of the Law.”<sup>44</sup>

The first option is the one most often associated with the Gentile Christian view. My objection to this view is that it ignores the genitive absolute which follows, “their conscience also bearing witness ...” Although this is a debated point, this clause seems to

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<sup>42</sup> Käsemann, 64, says the conscience is “analogous” to the Mosaic Law.

<sup>43</sup> Moo, 151; Murray, 1.75; Schreiner, 122; Wilckens, 1.134.

<sup>44</sup> Barrett, 50; Best, 28-29; Byrne, 89; Dunn 1.100.

define τὸ ἔργον τοῦ νόμου in terms of an internal anthropological reality (the conscience) rather than in terms of deeds that are externally performed.<sup>45</sup>

Another problem with the first option is that it involves a narrowing of the term νόμος to the moral aspects of the Mosaic Law. Schreiner, for example, admits as much: “The focus must be on the moral norms of the Mosaic law, for it is hardly likely that food laws, the observance of days, or the practice of circumcision would be written on the heart.”<sup>46</sup> But in the context Paul seems to make a clear demarcation between Jews, who have the Mosaic Law, and Gentiles, who do not (vv 12, 14). Thus it seems unlikely that Paul would say that the Gentiles have “the conduct that the Mosaic Law demands” written on their hearts.

Thus I prefer option two: “the business, effect, or function of the Law.” Paul would then be saying that the conscience has an effect or function analogous to the Mosaic Law, namely, to provide knowledge of basic moral standards, as well as to serve as an internal warning system that produces a sense of self-approval or self-condemnation in relation to one’s conduct. It is this analogous function of the Mosaic Law which is written on their hearts in the form of their conscience. However, I admit that this rests on choosing an unusual meaning for ἔργον, so option one cannot be totally ruled out.<sup>47</sup> In any case, option one would not be inconsistent with the hypothetical interpretation.

Another exegetical question (already alluded to) is, What is the relationship between “the work of the law written on their hearts,” “their conscience” and “their

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<sup>45</sup> Some scholars answer this objection by arguing that the conscience as a distinct, confirmatory witness. Dunn, 1.101; Jewett, 216; Murray, 1.75; Schreiner, 123.

<sup>46</sup> Schreiner, 122; cp. Ziesler, 87.

<sup>47</sup> The meaning “business, function” is possible in classical Greek – see LSJ ἔργον IV.1.a.

conflicting thoughts accusing or even defending themselves”? Some commentators see these as three separate witnesses. Others combine the last two (conscience and conflicting thoughts) but separate it from “the work of the law,” so that there are two separate witnesses. Others combine all three as references to the same reality, namely, the conscience. I lean toward the last view, but the second view also has validity and cannot be ruled out.

### **Verse 16**

Verses 13-15 were a parenthesis. Paul now returns to the main sentence: “For all who have sinned apart from the Law will also perish apart from the Law, and all who have sinned under the Law will be condemned by the Law … on the day when God judges the secrets of humans through Christ Jesus – as my gospel declares.”

Bultmann thought that v 16 was a non-Pauline gloss,<sup>48</sup> but this has not received much support. It is better to treat v 16 as authentic, for, as Käsemann argued, it is in fact a necessary conclusion without which the whole paragraph would remain a torso.<sup>49</sup>

The fact that God’s eschatological judgment of humanity will be accomplished “through Christ” is attested elsewhere in the NT (Acts 10:42; 17:31; Rom 14:9; 2 Tim 4:1). I said at the beginning that in arguing for the hypothetical view, I do not want to be understood as saying that there will be no future judgment according to works. It is in fact a part of Paul’s gospel message, since it forms the necessary background against

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<sup>48</sup> Bultmann, “Glossen im Römerbrief,” in *Exegetica: Aufsätze zur Erforschung des Neuen Testaments* (ed. Erich Dinkler; Tübingen: Mohr [Siebeck], 1967), 282-83.

<sup>49</sup> Käsemann, 67.

which the message of the atonement makes sense.<sup>50</sup> The good news of God's grace in Christ makes no sense apart from the bad news that there will be a day of judgment. "Unless judgment is a stern reality, there is nothing from which sinners need to be saved and accordingly no 'good news.'"<sup>51</sup>

## OBJECTIONS TO THE HYPOTHETICAL VIEW

Now that I have offered my exegesis of Rom 2:12-16, I want to respond to the objections that have been raised against the hypothetical interpretation of Rom 2:13. Some of these objections are given from the standpoint of view B2a, i.e., the view that in vv 13-15 Paul is describing Gentiles who have become Christians, but most are consistent with either view B2a or B2b.

### (1) No hypothetical markers

The first objection to the hypothetical view is that Rom 2:13 contains no hypothetical markers. This is the most common objection and it is consistent with either the view that the Gentiles of vv. 14-15 are Christians (Cranfield, Gathercole, Wright) or the view that they are non-Christians (Snodgrass). The argument is stated well by Cranfield: Rom 2:12-16 cannot be hypothetical, since "there is nothing here to suggest that Paul is speaking merely hypothetically."<sup>52</sup> Snodgrass agrees, and adds, "The passage is assertive in character and has every indication of being meant seriously."<sup>53</sup> This

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<sup>50</sup> Byrne, 90; Fitzmyer, 307, 312.

<sup>51</sup> Morris, 129.

<sup>52</sup> Cranfield, 1.156.

<sup>53</sup> Snodgrass, "Justification by Grace," 74.

argument can be further strengthened by listing the sorts of hypothetical markers that would be expected if the passage were hypothetical. For example, we would expect terms like *εἰ* or *ἐάν* (“if”), or perhaps a phrase such as that used by Paul in Rom 6:19: “I am speaking in human terms” (*ἀνθρώπινον λέγω*).<sup>54</sup>

Now it must be admitted that Rom 2:13 appears to be a straightforward assertion: “the doers of the Law will be justified.” Nor should we deny that Paul intended it to be taken seriously. It sets forth the standard that God requires of those who would be justified by the Law. However, this does not mean that Paul thinks there are any actual people who meet that standard. As I stated above, I use the term “hypothetical” merely to assert that “the doers of the Law [who] will be justified” is an empty set, not to call into question whether Paul believes that the doers of the Law (if there were such) would be justified by means of their doing of the Law. Indeed, in Galatians, Paul states that Law-keeping would bring about righteousness in a counterfactual world where sinners were made alive by the Law and thus enabled to keep it: “If a Law had been given which was able to impart life, then righteous would indeed have been based on Law” (Gal 3:21). So Snodgrass is correct that the passage is meant to be taken seriously.

But what about the request for some indication that the passage is meant to be taken hypothetically? This is a legitimate request. Although *εἰ*, *ἐάν*, or *ἀνθρώπινον λέγω* are not present, there are two very important indicators in the text that have been overlooked.

First, as I said at the beginning of this paper, a “hypothesis” can also be “the antecedent clause of a conditional statement.” Although it is common in Greek for

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<sup>54</sup> Snodgrass, 74; Bird, *Saving Righteousness*, 160.

conditional statements to have antecedent clauses beginning with *εἰ* or *ἐάν*, it is not necessary; other ways of communicating conditionality are available in Greek. Conditionality can be expressed by using phrases like “whoever,” “all who,” or “the one who,” e.g., in the well-known verse from the Gospel of John: “For God so loved the world, that He gave His only begotten Son, that whoever believes (*πᾶς ὁ πιστεύων*) in Him shall not perish, but have eternal life” (John 3:16). Although not stated using an antecedent clause, the concept of conditionality is clearly present. If a person believes in God’s Son, they will not perish but have eternal life.

Another example, closer in form and content to Rom 2:13 is Paul’s quotation of Lev 18:5 in Rom 10:5 and Gal 3:12: “The one who has done these things shall live by them” (*ὁ ποιήσας αὐτὰ ζήσεται ἐν αὐτοῖς*, translation mine).<sup>55</sup> Clearly this means, “If a person has done these things, they will live by them.” By analogy, then, Rom 2:13b may legitimately be translated, “If people do the Law, they will be justified.” Of course, it goes without saying that making a conditional statement like this does not commit the speaker to the additional affirmation that the condition will in fact be met. The speaker is merely affirming that if the condition is met, the consequence will obtain.

The second hypothetical indicator, as I argued above, is the *γάρ* at the beginning of v 13, which links back to v 12b. Recall that I argued that v 12b ought to be translated “all who have sinned under the Law will be *condemned* by the Law.” The decision to translate *κριθήσονται* “will be condemned” is crucial, because it sets the stage for the proper interpretation of v 13. If we translate *κριθήσονται* as “will be judged” in the neutral sense, then the logical connection with v 13 is less apparent. What is the

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<sup>55</sup> That Rom 2:13 implicitly echoes Lev 18:5 is argued by Fitzmyer, 308; Bruce, 85; and Lincoln, 142.

significance, then, of the γάρ at the beginning of v 13 linking back to v 12b? Moo puts it this way: “Paul explains why even those who possess the Law will nevertheless be condemned when they sin. It is because the Law can justify only when it is obeyed.”<sup>56</sup> Or to quote Calvin: “If righteousness be sought from the law, the law must be fulfilled; for the righteousness of the law consists in the perfection of works.”<sup>57</sup>

Thus, the hypothetical character of v 13 is indicated by two things: (1) by the implicitly conditional form of the sentence itself, and (2) by the logical relation between v 13 and v 12b.

## (2) Judgment according to works in Paul

The second objection against the hypothetical view is that it is unnecessary. It is argued that there is no need to evade the plain sense of Rom 2:13 because it is consistent with Paul’s teaching elsewhere concerning final judgment according to works. For example in Rom 14:10-12 Paul affirms that “We will all stand before the judgment seat of God ... Each one of us will give an account of himself to God.” In a similar manner, 2 Cor 5:10 says, “We must all appear before the judgment seat of Christ, so that each one may be recompensed for their deeds in the body, according to what they have done, whether good or bad.” Other Pauline or deutero-Pauline passages with a similar judgment motif include 1 Cor 3:10-15; 4:1-5; 2 Cor 9:6; 11:15; Gal 6:7; Col 3:24-25; Eph 6:8; 1 Tim 5:24-25; and 2 Tim 4:14.<sup>58</sup> In many of these passages believers are the objects of divine judgment. Furthermore, the final judgment is pictured as involving some sort of

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<sup>56</sup> Moo, 147.

<sup>57</sup> Calvin, 47; quoted by Moo, 148 n 23.

<sup>58</sup> These are the texts cited by Snodgrass, “Justification by Grace,” 74.

judgment according to works. The argument, then, is that if Paul can speak of a future judgment according to works, we should not be surprised if he also speaks of a future justification (i.e., vindication) according to works. Snodgrass writes: “The theme of judgment according to works, although many have great difficulty in seeing how it fits in Paul’s thought, is repeated frequently by Paul and without any suggestion that it causes any difficulty.”<sup>59</sup> Donfried adds: “To simply dismiss these texts as relics from Paul’s Jewish past is to fundamentally misunderstand the scope and richness of Pauline theology.”<sup>60</sup> To adopt the hypothetical approach to Rom 2:6-11, 13, it is argued, simply shifts the problem to these other passages.<sup>61</sup>

This is not the place to engage in exegesis of these passages. For the sake of this discussion, I will stipulate that Paul does in fact speak of a judgment according to works, even for the believer. Nevertheless, I am not convinced that we must interpret Rom 2:13 along the same lines. To begin with, Rom 2:13 stands out as unique amid the above list. It would be the only text where Paul states that people will be “justified” or “declared and treated as righteous” by obedience to the Law. It is one thing to say that believers must give an account of their conduct at the day of judgment. It is another to say that believers will be “declared and treated as righteous” on the basis of their deeds. Furthermore, Rom 2:13 connects justification with doing the Mosaic Law, whereas the judgment passages have Christian conduct in view.

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<sup>59</sup> Snodgrass, 74.

<sup>60</sup> Karl P. Donfried, “Justification and Last Judgment in Paul,” reprinted in *Paul, Thessalonica, and Early Christianity* (London: T. & T. Clark, 2002), 271.

<sup>61</sup> Richard B. Gaffin, Jr., *By Faith, Not by Sight: Paul and the Order of Salvation* (Milton Keynes, U.K.: Waynesboro, Ga.: Paternoster, 2006), 97. Cf. Murray, 1.63; Schreiner, 115.

Another problem with connecting Rom 2:13 with the “judgment according to works” motif in Paul is that the rhetorical situation and audience are not the same. In the judgment passages, it clear that Paul is addressing Christians and warning them that they will be called to give an account of their conduct at the judgment seat of Christ. In Rom 2:13 the rhetorical context is a diatribe<sup>62</sup> addressing (imaginary) unbelieving Jews who think they will escape divine judgment because of their superior moral knowledge, commitments, and conduct. The presuppositions of grace are not in operation in Rom 2.<sup>63</sup> At this stage in his argument Paul is establishing a baseline of divine impartiality in judgment, to which both Jews and Gentiles are subject, and in view of which they stand equally condemned apart from the gospel. In the judgment passages, by contrast, the gospel is not bracketed but assumed; Paul employs the judgment motif as a motivation for godly living on the part of those who profess faith in Christ.

For these reasons, we should not assume that Rom 2:13 belongs in the same category as the judgment passages like 2 Cor 5:10. I will have more to say about the relationship between Rom 2:13 and judgment according to works at the end of this paper, but I think I have raised enough questions about the propriety of reading Rom 2:13 in light of these passages and in light of the presuppositions of grace as applied to a Christian audience.

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<sup>62</sup> Stanley K. Stowers, *The Diatribe and Paul's Letter to the Romans* (SBLDS 57; Chico: Scholars Press, 1981); Thomas H. Tobin, *Paul's Rhetoric in Its Contexts: The Argument of Romans* (Peabody, Mass.: Hendrickson, 2004).

<sup>63</sup> “No eschatological facts are made known” (Käsemann, 64). “The whole context is one of judgment, not salvation” (Stott, 87). Cf. Wilckens, 1.134.

### (3) The uncircumcised Law-keeper (vv 25-29)

The third objection to the hypothetical view is that vv 25-29, a paragraph which occurs later in the same chapter, provides us with a clue that Paul has real people in view. In this passage Paul speaks of “the uncircumcised man [who] keeps the requirements of the Law” (v 26), who “keeps the Law” (v 27), and whose “circumcision is that which is of the heart, by the Spirit, not by the letter” (v 29). This seems to be a description of a converted Gentile. The nearness of this paragraph has convinced many that the earlier paragraph (vv 12-16) also has Gentile Christians in view. In N. T. Wright’s judgment, the fact that Paul has Gentile Christians in view in vv 25-29 is “the easiest point to prove of all the contentious things I wish to argue about Romans 2.”<sup>64</sup> Wright’s argument for taking vv 25-29 as referring to Christians is that the “letter/Spirit” contrast of v 29 is paralleled by Rom 7:6 and 2 Cor 3:6, where it roughly corresponds to a contrast between being “in the flesh” and being “in the Spirit.” In addition, the spiritual interpretation of circumcision in v 29 is paralleled by Phil 3:3: “For we are the [true] circumcision, who worship in the Spirit of God and glory in Christ Jesus and put no confidence in the flesh.” The contrast is between Christians (Paul and his Philippian audience) on the one hand, and non-Christian Jews, on the other. Wright also sees in Rom 2:25-29 the language of covenant renewal, alluding to the new covenant prophecy in Ezek 36:24-28, which also mentions the Spirit and the giving of a new heart, leading to obedience to the covenant. Wright admits that Paul only hints at these themes, but he thinks Paul will flesh them out later in Rom 8:1-11; 10:5-11; and 13:8-10. Paul is thus “interjecting hints of things yet to

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<sup>64</sup> Wright, “The Law in Romans 2,” 134.

come ... like a symphonic composer.”<sup>65</sup> Gathercole speaks of “occasional forward glances” to the age of Christ and the Spirit.<sup>66</sup>

This objection is probably the strongest argument against the hypothetical view. However, some considerations can be adduced by way of response.

First, if the opponents of the hypothetical view demand hypothetical markers in order to be convinced that 2:13 is hypothetical, then they ought to accept 2:25-26 as hypothetical, since here a hypothetical marker (*ἐάν*) is used, and not just once but three times: περιτομὴ μὲν γὰρ ὡφελεῖ ἐὰν νόμον πράσσης· ἐὰν δὲ παραβάτης νόμου ἦς, ἢ περιτομή σου ἀκροβυστία γέγονεν. ἐὰν οὖν ἡ ἀκροβυστία τὰ δικαιώματα τοῦ νόμου φυλάσσῃ, οὐχὶ ἡ ἀκροβυστία αὐτοῦ εἰς περιτομὴν λογισθήσεται;

Second, to interpret 2:26-27 as referring to Gentile Christians would mean that Paul here describes Christians as those who “keep/observe the requirements of the Law” (τὰ δικαιώματα τοῦ νόμου φυλάσσῃ [v 26]), who “keep/complete the Law” (τὸν νόμον τελοῦσα [v 27]). But nowhere else does Paul say that Gentile Christians “keep the Law” using the verbs φυλάσσω or τελέω. When these verbs have the Mosaic Law as their direct object they have a strong Jewish flavor, i.e., a connotation of scrupulous Torah observance. It is true that on several occasions he says that Christians “fulfill” the Law by following the law of love and by walking in the Spirit (Rom 8:4; 13:8-10; Gal 5:14), but that is a very different thing, as Stephen Westerholm has persuasively argued.<sup>67</sup>

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<sup>65</sup> Wright, “The Law in Romans 2,” 136-38. Similarly Bird, *Saving Righteousness*, 168, argues that “Paul’s style of argument is hardly linear but circles around in on itself so that themes and motifs appear again and again.”

<sup>66</sup> Gathercole, “A Law unto Themselves,” 47.

<sup>67</sup> Westerholm, *Perspectives*, 433-39. Cp. Moo, 150 n. 36; 170 n. 21.

Third, the language of vv 28-29, especially the reference to “circumcision of the heart by the Spirit” ( $\pi\epsilon\rho\tauομὴ καρδίας ἐν πνεύματι$ ), is admittedly applicable to Christians. Yet this does not mean that Paul has Christians per se in view at this point. In other words, there is a bleed-over of Christian concepts into the description of these hypothetically Law-keeping Gentiles. Jouette Bassler explains this phenomenon as follows:

The situation is complicated by the fact that Paul knows the final stage of his argument, that it is, in fact, only the Christians who can fulfill the demands of the Law. So although Paul must, for the sake of his argument, speak here in general terms of the ideal Greek or Gentile *as such*, it is probably no accident that the contours that Paul gives to this figure *also* fit the Christians. That is, in this part of his argument Paul is describing pagans, not Christians, but when his argument requires a positive tone, this description cannot help anticipating—but not directly proclaiming—the heart of his message.<sup>68</sup>

However, this interpretation should only be applied to vv 28-29, not vv 25-27 or vv 12-16. As Moo argues, in vv 28-29 Paul alludes for the first time in Rom 2 to Christians. But it is only an allusion: Paul is not describing an actual group of people but specifying what qualifies a person to be a “true Jew.”<sup>69</sup>

Furthermore, as Byrne points out, Paul’s argument that “true circumcision” is not merely a matter of an outward rite but must be accompanied by a circumcision of the heart is straight out of the Old Testament (Deut 10:16; 30:6; Jer 4:4; 9:25-26; Ezek 44:7, 9) and widely repeated in post-biblical Jewish literature (1QS 5:5; 1QH 2:18; 1QpHab 11:13; *Jub.* 1:23; *Odes Sol.* 11:1-3; Philo, *Spec.* 1.305; *Migr.* 92). Thus, as throughout Rom 2, Paul has not gone beyond his Jewish frame of reference. Paul is using thoroughly scriptural and Jewish arguments to indict the Jews of sin on their own principles. Even

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<sup>68</sup> Bassler, *Divine Impartiality*, 145.

<sup>69</sup> Moo, 175.

the reference to “in Spirit” (v 29) need not be interpreted in explicitly Christian terms as a reference to the Spirit poured out at Pentecost. As Byrne writes:

*Implicitly*, however, and certainly for the Christian readership in Rome, who “overhear” Paul’s indictment of the Jewish dialogue partner at this point, the “spirit” must be the Holy Spirit and the “true Jew” the Christian believer ... Nonetheless, it is a disservice to Paul’s argument to “Christianize” it “too early” and fail to appreciate the way in which it operates as an “inner-Jewish” indictment couched in biblical terms.<sup>70</sup>

#### (4) “In accordance with my gospel” (v 16)

The fourth objection to the hypothetical view is consistent with either of the real views (Gentile Christians or non-Christian Gentiles). James Dunn gives voice to this objection when he writes: “Why judgment ‘in accordance with my gospel’ should be invoked when no one is actually in view remains something of a puzzle.”<sup>71</sup> Similarly Kent Yinger thinks that v 16 weakens the argument for the hypothetical interpretation.<sup>72</sup>

As I argued above, I think it is reasonable to take vv 13-15 as a parenthesis. If the parenthesis is removed, then v 12 and v 16 may be taken together as forming a single sentence: “For all who have sinned apart from the Law will also perish apart from the Law, and all who have sinned under the Law will be condemned by the Law ... on the day when God judges the secrets of humans through Christ Jesus – as my gospel declares.” Others suggest that v 16 could be connected with the whole passage (vv 5-15) which deals with the nature and consequences of the day of judgment.<sup>73</sup> Either way, Paul is

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<sup>70</sup> Byrne, 104.

<sup>71</sup> Dunn, “The Dialogue Progresses,” in *Lutherische und Neue Paulusperspektive* (ed. M. Bachmann; WUNT 182; Tübingen: Mohr [Siebeck], 2005), 405.

<sup>72</sup> Yinger, *Judgment According to Deeds*, 177; Bird, *Saving Righteousness*, 160; Gaffin, *By Faith*, 95.

<sup>73</sup> Murray, 1.76-77.

merely stating that on the day of judgment God will judge the secrets of humans through Christ Jesus, and that this judgment is a truth that is proclaimed in his gospel. The phrase κατὰ τὸ εὐαγγέλιον μου should thus be translated, “as my gospel declares” (NIV). Judgment is part of the gospel message.<sup>74</sup> Judgment according to deeds is not only part of the gospel in the sense that it prepares for the revelation of God’s grace, but it also reappears after the gospel has been proclaimed. Even believers will be judged according to their deeds. Although judgment according to works for believers will not be on the same strict basis as that envisioned in v 13 (“the doers of the Law will be justified”), it is probable that an evangelical re-appropriation of the doctrine of judgment is in the back of Paul’s mind, and this may explain why Paul says that God will judge the world “as my gospel declares.” I will explain this point more fully in the final section of this paper.

## (5) Symmetry between condemnation and justification

A related objection is that the hypothetical view introduces an asymmetrical relationship between the negative verdict (κριθήσονται) and the positive verdict (δικαιωθήσονται). Michael Bird argues that there must be symmetry between the two: since the condemnation for those who disobey the law is real, so too the justification of the doers of the law must be real.<sup>75</sup> Romans 2:6-16 is dealing with real outcomes before God on the day of judgment.

But Bird’s plea for symmetry is improper in this context, for Paul states that *all* who have sinned (aorist) will be condemned: “*All* who have sinned apart from the Law

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<sup>74</sup> Moo, 155; Murray, 1.77; Ziesler, 88.

<sup>75</sup> Bird, *Saving Righteousness*, 160, 169.

will also perish apart from the Law, and *all* who have sinned under the Law will be condemned by the Law” (2:12). Because we know the rest of Paul’s argument (unlike Paul’s audience)<sup>76</sup> it is tempting for us to insert an asterisk beside the two *all*’s of v 12 to the effect that there is an exception for those who have their sins forgiven through Christ. But surely that is to get ahead of Paul’s argument. In the words of Hans Lietzmann, Paul is arguing from a *vorevangelische Standpunkt* (a pre-evangelical point of view)<sup>77</sup> at this stage in his argument. Everything is driving to the conclusion that “*all* are under sin” (3:9), that “there is *none* righteous, not even one” (3:10), so that “*every* mouth may be closed and *all the world* may become accountable to God” (3:19). Once we recognize the unfolding of Paul’s broader argument from wrath (1:18–3:20) to grace (3:21ff), the necessary *asymmetry* of Paul’s argument comes into focus: but for the grace of God, the only real outcome would be condemnation (*κριθήσονται*).

#### (6) Allusion to Jeremiah 31:33 (38:33 LXX)

Sixth, many scholars have seen in the phrase “the work of the law written on their hearts” an allusion to the prophecy of the new covenant in Jeremiah 31:33 (38:33 LXX). Cranfield sees it as a “deliberate reminiscence.”<sup>78</sup> N. T. Wright thinks it is “next to

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<sup>76</sup> “It must be acknowledged that we have no guarantee that these churches [in Rome] knew of Paul’s doctrine of justification by faith prior to their reception of the epistle ... An audience that may not have had access to the full exposition of Paul’s doctrine, 1:18–3:20 is necessary ground to cover before he outlines the positive content of his doctrine of justification by faith” (Lamp, “Paul, the Law, Jews, and Gentiles,” 51).

<sup>77</sup> As quoted by Kuss, 64.

<sup>78</sup> Cranfield, 1.158.

impossible” that Paul could have penned these words without alluding to Jeremiah 31.<sup>79</sup>

Gathercole says that the similarity is “striking” and points out that Rom 2:15 and Jer 38:33 (LXX) share four lexemes in common.<sup>80</sup>

|                                       |  |
|---------------------------------------|--|
| Jer 38:33 (LXX)                       | Rom 2:15                                     |
| Διδοὺς δώσω <u>νόμους</u> μον εἰς τὴν | οἵτινες ἐνδείκνυνται τὸ ἔργον τοῦ            |
| διάνοιαν αὐτῶν καὶ ἐπὶ <u>καρδίας</u> | <u>νόμου γραπτὸν</u> ἐν ταῖς <u>καρδίαις</u> |
| αὐτῶν γράψω αὐτούς                    | αὐτῶν  |

This may seem impressive at first until one observes there are three important differences between the two verses, thus making it unlikely that Rom 2:15 is an allusion to Jer 38:33 (LXX).

First, in Rom 2:15, the work of the Law is written *ἐν* their hearts, not *ἐπί*, the preposition found in the LXX.

Second, in Rom 2:15 *νόμος* is singular, not plural (*νόμους*) as in the LXX (“I will place my *laws* in their minds and on their hearts I will write *them*”). It is true that the Hebrew text has the singular form (*torah*). But it is highly unlikely that the Roman Christians would have been familiar with the Hebrew text. In fact, many scholars now believe that the Roman Christians were former God-fearers whose familiarity with the scriptures was originally based on hearing the LXX read in the Diaspora Greek-speaking synagogues in Rome.<sup>81</sup> It is probable that the Greek rather than the Hebrew Bible was the Bible used in the Christian communities of Rome.

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<sup>79</sup> Wright, “The Law in Romans 2,” 147.

<sup>80</sup> Gathercole, “A Law unto Themselves,” 41.

<sup>81</sup> Tobin, *Paul’s Rhetoric in Its Contexts*, 23-34; A. Andrew Das, *Solving the Romans Debate* (Minneapolis: Fortress, 2007).

The third and decisive difference is that in Rom 2:15 it is  $\tau\ddot{o}\ \check{\epsilon}\rho\gamma\sigma$  that is  $\gamma\rho\alpha\pi\tau\acute{o}\nu$  (written), not  $\dot{o}\ v\acute{o}\mu\sigma\zeta$ .<sup>82</sup> The participle  $\gamma\rho\alpha\pi\tau\acute{o}\nu$  is a neuter accusative, rather than a masculine genitive; therefore, it agrees with  $\check{\epsilon}\rho\gamma\sigma$  not  $v\acute{o}\mu\sigma\zeta$ .<sup>83</sup> Thus, whereas the LXX says “I will write my laws on their hearts,” Paul says that the *function* or *work* of the Law is written on their hearts. Gathercole thinks this is splitting hairs.<sup>84</sup> But this distinction is more significant than he admits, since it completely changes the metaphor. The thing that is written on the hearts of these Gentiles is “the function or functional equivalent” of the Law, namely, the conscience. The immediately juxtaposed genitive absolute clause  $\sigma u m m a r t u r o u s \eta \varsigma \alpha' t \hat{o} w n \tau \hat{h} \varsigma \sigma u n e i d \acute{h} \sigma e \omega \varsigma$  (“their conscience bearing witness”) provides an explanation of the writing metaphor. Gathercole thinks that the writing metaphor means that these Gentiles “have had the knowledge of God’s will inscribed in their hearts by the Holy Spirit.”<sup>85</sup> But the Holy Spirit is not mentioned in the immediate context!<sup>86</sup> The writing metaphor of v 15a is explicated grammatically by the conjoined genitive absolute clause of v 15b, and that clause speaks solely in terms of *conscience*, not the Spirit. As Käsemann argues, the point of the expression is that, while the Gentiles may not have the moral requirements of God in a distinct, written form, they nevertheless have an analogue, so that they too are accountable to God and without excuse. It is the concept of “unwritten law” ( $v\acute{o}\mu\sigma\zeta\ \check{\alpha}\gamma\rho\alpha\phi\sigma$ ) or natural law, a Greek (Stoic) idea that

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<sup>82</sup> Barrett, 50; Lamp, 47; Moo, 152; Schreiner, 122.

<sup>83</sup> Morris, 126 n. 89; Ye, *Paul, the Doers of the Law*, 141.

<sup>84</sup> Gathercole, “A Law unto Themselves,” 41.

<sup>85</sup> Ibid., 37.

<sup>86</sup> The Spirit is mentioned later in the chapter, in v 29, but it is questionable exegesis to skip the explicit explanation provided in the immediate context (v 15) and leap forward two paragraphs to bring in a later concept.

made its way into Jewish thought.<sup>87</sup> For example, *2 Bar.* 57:2 states that in the time of Abraham “the unwritten law was in force” (cp. *Jub.* 23:10; *b. Yoma* 28b). Paul is likely alluding to this concept and explaining that the Gentiles, who may seem to be excusable because they do not have the Mosaic Law, are in fact morally accountable because they have the work of the law “written,” not literally, but in their hearts, via the natural revelation of God in creation and conscience.

## (7) Impossibility of justification by works

A seventh objection against the hypothetical view is that it implies that theoretically a person could be justified by the works of the Law if they kept the Law perfectly. On the hypothetical view, it is only because of universal sinfulness that justification by works is not a reality. Otherwise, justification by works would be possible. But this appears to be contradicted by Paul himself in Rom 3:20, when he states that “no flesh shall be justified before God by works of the Law.” Michael Bird thinks that in this verse “Paul does not merely deny the *reality* of justification by works, but he denies the very *possibility*.<sup>88</sup>

But Bird reads too much into the verse. Paul does not deny the very possibility of justification by works. He merely states – precisely as the hypothetical view claims – that *no fallen human being* (“no flesh”) will be justified by works. This is not the place for an extended argument, but I believe it is theologically legitimate to argue that if Adam had

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<sup>87</sup> Käsemann, 63-64; cp. Moo, 150-51; Schreiner, 122; Martens, “Romans 2:14-16,” 55-67; Friedrich Kuhr, “Römer 2,14f. und die Verheissung bei Jeremia 31,31ff.” *ZNW* 55 (1964): 259; Günther Bornkamm, “Gesetz und Natur (Röm 2,14-16),” in *Studien zu Antike und Urchristentum II* (BEvT 28; München: Chr. Kaiser Verlag, 1963), 93-118.

<sup>88</sup> Bird, *Saving Righteousness*, 160.

not sinned and plunged the human race into a state of condemnation and enslavement to the power of sin, it would be possible for humans to be accounted as righteous before God on the basis of their works. This is traditionally referred to as “the covenant of works” in Reformed theology. Such a concept takes us into the realm of constructive systematic theology, but I believe the case for a covenant of works can be mounted on the basis of Paul’s teaching, e.g., his use of Lev 18:5 in Rom 10:5 and Gal 3:12, along with other texts.

## PROBLEMS FOR THE GENTILE CHRISTIAN VIEW

I have responded to seven objections against the hypothetical view. I now want to raise several problems with the Gentile Christian interpretation, the leading rival to the hypothetical view.

### (1) Meaning of $\xi\thetav\eta$

The first problem with the Gentile Christian interpretation is that it must take  $\xi\thetav\eta$  (v 14) in a more restrictive sense than is usual in Paul. Typically,  $\xi\thetav\eta$  means “Gentiles” in general, that is, non-Jews, without demarcating the very small subset of Gentiles who also happen to be Christians. It is true that there are a handful of texts where Gentile Christians are in view, but when this is the case, the context makes clear that the believing subset of Gentiles is in view (e.g., Rom 9:30). But no such narrowing or delimiting is found in Rom 2:14-15. In the immediately preceding context (2:9-12), all humanity is divided into “Jews” and “Gentiles,” “those who have the Law” and “those who do not.” Nothing in v 14 hints that a narrower definition of  $\xi\thetav\eta$  is being used. Paul

is speaking of Gentiles *qua* Gentiles. When Paul speaks of “Jews and Gentiles” in this context his intention is to cover the whole of humanity.<sup>89</sup>

## (2) The universal impartiality of God

A second (and related) problem with seeing the Gentiles of vv 14-15 as Christians is that it weakens the development of Paul’s argument concerning the universal impartiality of God, that is, the notion that God judges all humanity, both those under the Law (Jews) and those outside of the Law (Gentiles), on the basis of the same standard. In her dissertation on divine impartiality, Jouette Bassler makes this point:

The reference to ἔθνη in Rom 2:14 occurs in a unit or paragraph unfolding the question of the impartiality of God’s justice. A reference to Gentile-*Christians* would therefore leave unanswered, even call into question, the issue of this impartiality apart from the Christ event. Yet the first unit of Paul’s argument (1:16–2:11) dealt with precisely this issue as it emphasized that both Jews and Greeks—certainly non-Christian Greeks were intended here—were recompensed according to an impartial standard of merit. Only the question of how the selective dispensation of the Law affected this impartiality was left unanswered, and it is this aspect of the question that is clearly the center of Paul’s attention in 2:12-29. Thus the context seems to demand here, too, a discussion in terms of Jews and Gentiles *per se*.<sup>90</sup>

Paul’s argument concerning the universality of God’s impartiality would have a gaping hole if he were only arguing for God’s impartiality in judging the Jews and those Gentiles who happen to be Christians. Taken together these two groups constitute only a small fraction of humankind. What about God’s impartiality in judging the rest of the Gentile world? Paul speaks of God’s impartial judgment as being “to the Jew first and also to the Greek” (vv 9-10). If “the Jew first” stands for all Jews (messianic and non-messianic),

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<sup>89</sup> Achtemeier, 49.

<sup>90</sup> Bassler, *Divine Impartiality*, 143-4.

then “the Greek” must represent all Gentiles (Christian or non-Christian). By definition, God’s impartiality must be universal, otherwise God would not be impartial.<sup>91</sup>

### (3) “A law to themselves” (v 14)

The third problem with the Gentile Christian view is that it seems inappropriate to say that Christians are “a law to themselves” ( $\epsilon\alpha\gamma\tau\omega\varsigma\ \epsilon\iota\sigma\iota\nu\ \nu\mu\o\varsigma$ ). In Paul’s thought, Christians are never a law to themselves, but, as he explains later in chapter six, are “enslaved to God” (Rom 6:22). Later on in Romans, he says that “none of us lives for himself” (Rom 14:7). It is hard to imagine Paul saying that Christians are “a law unto themselves.”<sup>92</sup>

### (4) Accusing thoughts (v 15)

Fourth, the last part of v 15 is a genitive absolute clause in which Paul further explains how the human conscience operates: “as their conscience bears witness and their conflicting thoughts accuse or even [ $\eta\ \kappa\alpha\iota$ ] defend themselves.” This description of the operation of human conscience appears to be generic, that is, it seems to apply to both the saved and the unsaved alike. It does not appear to be a description unique to Christians. Paul recognizes, of course, that self-approving thoughts do occur on occasion, but his use of the phrase  $\eta\ \kappa\alpha\iota$  (“or even”) implies that self-approving thoughts are not

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<sup>91</sup> Wright, 441, claims that “to the Jew first and also to the Greek” (vv 9-10) refers to *Christian* Jews and Gentiles. But this is remarkable. Surely Paul is not arguing that God’s impartiality applies to all Christians, whether Jew or Gentile, but to all *humanity*, whether Jew or Gentile.

<sup>92</sup> Käsemann, 65; Schreiner, 123.

the norm.<sup>93</sup> Although their conscience *may even* defend them on occasion, primarily their conscience accuses them.

Those who think Paul is describing Christians here have to explain this reference to self-accusatory thoughts. Wright, for example, says, “Perhaps because their situation, being outside the Torah and yet fulfilling it from the heart, leaves them with questions that may produce a moment of panic.”<sup>94</sup> But there is no hint anywhere else in Paul that he thinks Gentile Christians lack assurance of their standing before God, in contrast with Jewish Christians who supposedly have no doubts – much less because of their Torah observance. Given Paul’s jubilant expressions of assurance throughout Romans on the basis of God’s free justification of Jews and Gentiles by faith apart from the works of the Law (cp. 5:1-11; 8:1, 28-39), why would he picture Gentile Christians before the judgment seat of God suddenly seized with panic due to their situation of being outside the Torah?

### (5) The lead sentence (v 12)

The fifth problem with the Gentile Christian interpretation is explained by Thomas Schreiner.<sup>95</sup> He points out that Paul cannot have a saving obedience in view in vv 14-15, since the lead sentence rules it out. The Gentiles are introduced under the blanket condemnation of v 12 as those who “have *sinned* apart from the Law” and who “will *perish* apart from the Law.” If in fact some Gentiles are able to obey God’s moral requirements well enough to avoid a sentence of divine condemnation, Paul’s lead

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<sup>93</sup> Das, *Paul*, 180-81; Dunn, 1.102; Moo, 153; Sanday and Headlam, 62; Schreiner, 124.

<sup>94</sup> Wright, 442; idem, “The Law in Romans 2,” 146.

<sup>95</sup> Schreiner, 124.

sentence in v 12 should have been written more broadly so as to include not only those who “sin” and “perish” but those who “obey” and “are justified.” The fact that the lead sentence only envisions Gentiles sinning and perishing suggests that the obedience mentioned in vv 14-15 is only partial and occasional, sufficient only to show that they are without excuse but not sufficient for salvation.

#### RELATION OF ROM 2:13 to 3:20

I turn now to what I believe is the Achilles’ heel of all non-hypothetical views. The problem is this: if one rejects the hypothetical interpretation of 2:13, how does one resolve the apparent contradiction between 2:13 and 3:20? As I said at the beginning of this paper, it is not as though we are dealing with an apparent contradiction between two separate epistles. We are confronted with an apparent, head-on contradiction in the same epistle, indeed, within the same argumentative section, Rom 1:18–3:20, which almost all scholars and commentators agree is a unit.

As I said, most critics of the hypothetical view, whether they are proponents of view B2a or view B2b, attempt to resolve the apparent contradiction by arguing that “doing the Law” (2:13) is not the same thing as “the works of the Law” (3:20). The phrase “doers of the Law ( $\piοιηται\;vομου$ )” (2:13) is taken in a *positive* sense, as referring to “the obedience of faith” (Rom 1:5) or the “fulfillment of the Law” by the Spirit (Rom 8:3-4; 13:8-10) that Paul speaks of elsewhere. For example, Wright says that what the “doing of Torah” in 2:13 entails will be developed more fully in Rom 8:1-11; 10:5-11; and 13:8-10, and that this fulfillment of the Law by Gentile Christians is “of a

different order” from Jewish fulfillment.<sup>96</sup> Thus “doers of the Law” is interpreted in a positive sense.

Meanwhile, the phrase “works of the Law (*ἔργα νόμου*)” (3:20) is taken in a negative sense. In order to alleviate the tension between Rom 2:13 and 3:20, advocates of the New Perspective on Paul take *ἔργα νόμου* as a *terminus technicus* that denotes something more specific than obedience to the Law. James D. G. Dunn raises the problem by looking at Gal 2:16 rather than Rom 3:20, but the tension is the same since both texts firmly deny that people are justified by “works of the Law.” Here is Dunn’s attempted resolution of the apparent contradiction:

In denying that justification is *ex ergōn nomou*, Paul cannot have intended to discourage his readers from doing ‘good works’, since he certainly believed that judgment would have reference to just such ‘good (deeds/works)’ done during life (Rom. 2.7, 10; 2 Cor. 5.10). What then was being denied in Gal. 2:16? ... ‘The works of the law’ must be rather more circumscribed than is usually assumed. There are ‘works of the law’ which provide no basis for justification, and ‘works’ by reference to which final judgment shall be reached. Paul cannot have the same ‘works’ in view in both cases. What is so wrong about ‘the works of the law’ in Gal. 2:16? Evidently that they have proved antithetical to the openness of faith, to the claim that a Gentile’s faith alone is sufficient ground for full acceptance ... Once again, then, we are driven by the logic of Paul’s wider thought to the conclusion that by ‘works of the law’ Paul had in mind that obedience to the precepts of the law which was deemed still necessary for believing Jews, particularly at the point where it meant treating Gentiles as outside the community of salvation.<sup>97</sup>

Dunn states that when Paul denied justification by works of the Law, he had a limited target in mind, namely, Jewish exclusivism based on the practice of traditional marks of Jewish identity:

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<sup>96</sup> Wright, 441; idem, “The Law in Romans 2,” 149. Cp. Dunn, 1.107, who cites Rom 2:29; 3:31; 6:19-22; 7:6; 8:4; 12:1-15:6.

<sup>97</sup> Dunn, “Noch Einmal ‘Works of the Law’: The Dialogue Continues,” in *The New Perspective on Paul: Collected Essays*, 421.

Paul's differentiated view of the law could hold together both the affirmation that final justification will not be 'from works of the law' and the thought that final judgment will be according to 'works (of the law)' ... We are therefore driven to a twofold conclusion in regard to Paul's theology of 'works': (1) the principle of justification by faith does not exclude the obligation to works, even works of the law; and (2) *when Paul denies that justification depends on works of the law he had a more limited target in mind*, particularly his fellow Jewish believers' insistence that the practices which traditionally defined Israel must continue to be practiced by all those wanting to claim descent from Abraham.<sup>98</sup>

Similar quotes can be reproduced from other advocates of the New Perspective.

N. T. Wright defines ἔργα νόμου as "those things that marked out the Jews from their pagan neighbors ... the Sabbath, the food laws, and circumcision."<sup>99</sup> The early Francis Watson alleviated the apparent conflict between Rom 2:13 and 3:20 by claiming that "works" does not refer to human moral activity in general but specifically to the Jewish way of life.<sup>100</sup> And Hendrikus Boers argued that Paul's negation of justification through works of the Law does not reject the idea of justification by good works in general but only by "works of the law as the distinguishing mark of belonging to an exclusively favored community," "the Jewish claim to an exclusive relationship with God."<sup>101</sup>

Not all scholars who agree with the non-hypothetical interpretation of Rom 2:13 adopt the solution provided by the New Perspective. For example, Snodgrass resolves the tension between 2:13 and 3:20 by taking ἔργα νόμου in 3:20 to mean "works

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<sup>98</sup> Dunn, "Paul and the Torah: The Role and Function of the Law in the Theology of Paul the Apostle," in *The New Perspective on Paul: Collected Essays*, 460-61 (emphasis mine). The same solution is adopted by Garlington, *Faith, Obedience, and Perseverance*, 5-8, 55, and Yinger, *Judgment According to Deeds*, 169-75, both of whom acknowledge their dependence on Dunn.

<sup>99</sup> Wright, 461.

<sup>100</sup> Watson, *Paul, Judaism, and the Gentiles*, 119.

<sup>101</sup> Boers, "'We Who Are by Inheritance,'" 278-79; idem, *Justification*, 105.

righteousness,” “works done in the flesh,” or “striving after the law on one’s own.”<sup>102</sup> In a similar fashion, Ito thinks ἐργα νόμου means works performed by the unregenerate σάρξ. He interprets 3:20 as saying only that “no one who belongs to the realm of the flesh, that is, who is not yet redeemed, will be justified by works of the law before God.”<sup>103</sup>

This is not the place to engage the debate over ἐργα νόμου in detail, but as I said in footnote 2 above I am persuaded by those who argue that ἐργα νόμου does not refer to an abuse of the Law (whether legalism or exclusivism), but simply “doing what the Law requires” or “deeds done in obedience to the Law.” It is a colorless phrase and does not have an inherently negative sense. To take it in a negative sense as Dunn, Wright, Snodgrass, et al., do is to read into the phrase much more psychological and motivational baggage than is warranted. If the phrase were inherently pejorative, why did the Qumran sectarians use it to refer to their distinctive interpretation of the deeds required by the Torah (4QMMT)?

Furthermore, there is no justification for making such a radical separation between ποιηται νόμου and ἐργα νόμου. The two phrases are closely related: (a) they have the same form (a noun plus the objective genitive νόμου); and (b) they both employ nouns formed from verbs of “doing,” taking the Law as the object. Additionally, it is significant that ποιέω and ἐργα are inter-changeable in Paul’s usage (see his use of Lev 18:5 in Rom 10:5; Gal 3:12 where the verb ποιέω is used to refer to “doing” the Law). To place a major semantic chasm between “works of the Law” (negative) and “doers of the

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<sup>102</sup> Snodgrass, “Justification by Grace,” 84.

<sup>103</sup> Ito, “Romans 2,” 29.

Law” (positive) is not justified lexically, philologically, contextually, or theologically. It is hard to see how Paul could have placed such radically divergent connotations upon two phrases falling in the same semantic domain, especially in view of his interchangeable usage of *ποιέω* and *ἔργα* in other contexts where *νόμος* is the direct object.<sup>104</sup>

Thus there are insuperable difficulties in trying to place a wedge between “doers of the Law” (positive) and “works of the Law” (negative). One must adopt a view of “works of the Law” that is untenable, either by making the phrase refer to the boundary markers that exclude Gentiles (Dunn, Wright, Boers, the early Watson, Garlington, and Yinger) or by taking it as a reference to legalistic attempts to earn favor with God (Snodgrass). Neither of these approaches can withstand exegetical scrutiny.

This fact makes Gathercole’s embrace of the Gentile Christian view all the more puzzling. Gathercole has elsewhere expressed his disagreement *both* with the NPP interpretation of *ἔργα νόμου* and with the old “works-righteousness” interpretation. He defines *ἔργα νόμου*, as I would, as “deeds done in obedience to the totality of the Torah.”<sup>105</sup> But this then raises the question of how this is materially different from *ποιηταὶ νόμου*. And if it is not materially different, Gathercole must find some way of alleviating the apparent contradiction between Rom 2:13 and 3:20. But Gathercole does not address this problem so far as I can tell.

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<sup>104</sup> Watson, *Paul and the Hermeneutics of Faith*, 334.

<sup>105</sup> Gathercole, *Where is Boasting? Early Jewish Soteriology and Paul’s Response in Romans 1-5* (Grand Rapids: Eerdmans, 2002), 92.

## PAUL'S ABSOLUTISM OR PERFECTIONISM

There is another problem with the non-hypothetical views that raises broader issues of Pauline theology. In order to make Rom 2:13 a description of real people, non-hypothetical views must smuggle the concept of “imperfect obedience” into the phrase “doers of the Law.” Cranfield writes that final acquittal is on the basis of “those works of obedience which, though but *imperfect* and far from deserving God’s favour, are the expression of their heart’s faith.”<sup>106</sup> Gathercole does not use the language of perfection/imperfection but says that Rom 2:12-16 points to a “final vindication on the basis of an obedient life.”<sup>107</sup> In much the same way Wright thinks that future justification “takes place on the basis of the totality of the life lived.”<sup>108</sup> Advocates of the non-Christian Gentile view take a similar approach. Thus Snodgrass says that “there is nothing in Romans 2 to suggest that perfection is required for salvation,” and he goes on to appeal to Paul’s teaching concerning “the obedience of faith” (Rom 1:5) and “faith working through love” (Gal 5:6) as equivalent concepts that flesh out what it means to be a doer of the Law in a non-perfectionist sense.<sup>109</sup> Yinger denies that Paul requires flawless obedience and thinks it is merely a matter of “whether one’s life-pattern was to practice good.”<sup>110</sup>

It is understandable that those who wish to interpret Rom 2:13 in a real sense would want to avoid the implication that perfect obedience is required for final

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<sup>106</sup> Cranfield, 1.156.

<sup>107</sup> Gathercole, “A Law unto Themselves,” 48.

<sup>108</sup> Wright, “The Law in Romans 2,” 144.

<sup>109</sup> Snodgrass, “Justification by Grace,” 83, 85-86.

<sup>110</sup> Yinger, *Judgment According to Deeds*, 166-67, 181-82.

justification. No one claims that perfection is possible. But where *in the context* does this idea of imperfect obedience come from? It has to be smuggled in to avoid a theologically unacceptable idea of salvation by perfect obedience. But this is to do eisegesis rather than exegesis.

I would argue that in Rom 2 Paul is arguing *against* the notion that imperfect obedience will suffice. This is witnessed to by the language of v 13 as a whole: “It is not the hearers of the Law who are just before God, but the doers of the Law will be justified.” In other words, Paul says to the Jew, “It isn’t enough that you have access to the revealed will of God contained in the Law, or even that you are committed to doing it. What is required is actual, comprehensive obedience.” Paul continues this theme in the following paragraph where he asks probing questions intended to search out the reality of sin among the Jews (Rom 2:17-25). “You who say that one should not commit adultery, do you commit adultery?” etc. Thus, in Rom 2:13 Paul assumes that perfect obedience to the Law is necessary if one is to be justified by keeping the Law.<sup>111</sup>

Paul presupposes an absolutistic or perfectionist view of the divine moral standard, at least in the context of his argument in Romans 1-4. For example, Paul says that Abraham was “ungodly” (4:5). Is this literally true? Was Abraham no better than a pagan? In one sense, the answer is clearly not. He was a faithful follower of the Lord, imperfect to be sure, but faithful nonetheless. In Jewish literature, Abraham is regarded as a paragon of faithfulness and righteousness, and as practically without sin (e.g., *Avot* 5:3; *Jub.* 17:15-18; 19:9; 23:10; *Pr. Man.* 8; Sir 44:20; *T. Ab.* 10:13). So how can Paul call him “ungodly”? It is because of the absolutism of his argument. He is dealing with

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<sup>111</sup> Ye, *Paul, the Doers of the Law*, 101.

eschatological realities. In terms of the absolute requirements of God's justice, in terms of the necessity of perfect obedience for eschatological justification, Abraham fell short of the glory of God and therefore had to be justified in the extraordinary way, by faith. Many scholars use the language of "perfect obedience" to explain this dimension of Paul's thought.<sup>112</sup>

Or take the statement, "There is none righteous, no not one" (Rom 3:10). If we allow ourselves to bring in the gospel answer ahead of time, we would have to ask, "Paul, you don't really mean this, do you?" Surely Paul thought that it was possible for Christians, by the enabling power of the Spirit, to lead holy and godly lives and thus to be viewed as in some sense righteous, not perfectly righteous, but certainly not wicked either. But we would be getting ahead of Paul's argument here. Paul hasn't yet made the transition in the argument from wrath to grace (that will come in 3:21ff). At this stage, it is the absolute requirement of righteousness, in and of itself, that Paul is dealing with. By that standard, there is none righteous, no not one. Only when we see the perfect obedience required by God, will we be able to acknowledge the truth that we all fall short of the glory of God. And only when we acknowledge that, and our mouths are closed before the bar of divine justice, will we be able to appreciate what God has done in these last days to provide a way of being reckoned as "righteous" in his sight by grace, on the basis of the work of Christ.

This issue of Paul's perfectionistic or absolutistic interpretation of the Law comes up repeatedly in the debates surrounding the NPP. It is typically raised in the

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<sup>112</sup> Das, *Paul*, 145-70; Seyoon Kim, *Paul and the New Perspective: Second Thoughts on the Origin of Paul's Gospel* (Grand Rapids: Eerdmans, 2002), 143, 152-53; Moo, 156, 168; Schreiner, 138; idem, *The Law and Its Fulfillment*, 45, 60, 62, 64-66, 71.

interpretation of Gal 3:10. According to the old perspective, Paul's argument here presupposed an unstated assumption that no one can keep the Law perfectly. This would then explain why Paul says that "as many as are of the works of the Law are under a curse." Advocates of the NPP, however, have argued that this cannot be what Paul meant because the claim that the Law must be kept perfectly cannot be documented in the literature of early Judaism.<sup>113</sup> But if the hypothetical interpretation of Rom 2:13 is correct, then it would provide another piece of evidence that Paul did in fact hold that the Law requires perfect obedience – even though Judaism did not.

Paul held this perfectionistic view as an implication of the logic of the cross. The origin of Paul's absolutism was the Damascus experience of God's grace in Christ, shown to one who thought he had achieved perfect righteousness via the Law.<sup>114</sup> How could he, who was so zealous for the Law, be in need of the grace of Christ? It must be because the Law's requirement and his own sinfulness were actually much greater than he thought when he was a Pharisee. The pattern of his thought moved, as Sanders argued, from solution to plight.<sup>115</sup> Once he saw the radical nature of the solution – the death of God's Son under the curse of the Law – he realized the radical depths of the problem of human sinfulness in the face of God's perfect holiness. "If righteousness comes through the Law, then Christ died needlessly" (Gal 2:21).

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<sup>113</sup> "It would be extraordinarily un-Pharisaic and even un-Jewish of Paul to insist that obedience of the law, once undertaken, must be perfect ... In fact, it would be unheard of" (Sanders, *Paul, the Law, and the Jewish People*, 28-29). Cp. Michael Cranford, "The Possibility of Perfect Obedience: Paul and an Implied Premise in Galatians 3:10 and 5:3," *NovT* 36 (1995): 242.

<sup>114</sup> Kim, *Paul and the New Perspective*, 152.

<sup>115</sup> Even Westerholm, *Perspectives*, 421, is not afraid to adopt this slogan, rightly understood.

## JUDGMENT ACCORDING TO WORKS

Although much more could be said, my case for the hypothetical view must now come to a close. Yet there is one nagging issue of a broader theological nature that cries out to be addressed, the issue of judgment according to works. Obviously I cannot do justice to that theme here in this exegetical paper. Nevertheless, I think it would be appropriate to briefly sketch how I think Rom 2 should be related to that broader Pauline theme.

Simply stated, while Rom 2:6-11, 13 itself is hypothetical, it is not for this reason relegated to the trash heap of misguided ideas. Geerhard Vos, a Reformed advocate of the traditional hypothetical interpretation of Rom 2, makes this interesting suggestion:

Paul nowhere says that he recognizes this theory against his own better conviction, but on the contrary speaks of it with a degree of pathos ... While using the principle as a weapon [against Jewish confidence], Paul is none the less thoroughly in earnest about it; the propositions laid down [in Romans 2] receive his own assent ... Considered from the point of view of subjective soteriology its value might be nil, and yet, theologically considered, it might be of eternal validity and become productive in a new direction of the most far-reaching consequences. *Possibly ... there may have lain in the background of Paul's mind when he wrote this chapter the thought that, even under the economy of the gospel, the force of the principle of judgment according to works and of reward and punishment is not entirely suspended with reference to the individual believer;* though, of course, it can here no longer appear as an independent principle, but only in subordination to the supreme principle of grace.<sup>116</sup>

If this was in Paul's mind when he wrote Rom 2, then it we should not be surprised to find that the principle of judgment according to works is taken up by Paul elsewhere and redefined in terms of the gospel.<sup>117</sup> Paul does not discard the principle of final judgment but re-appropriates it within a new framework of grace, in which God will graciously

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<sup>116</sup> Vos, "The Alleged Legalism in Paul's Doctrine of Justification," 393-94 (emphasis mine).

<sup>117</sup> Byrne, 89.

accept our imperfect, Spirit-wrought obedience as truly good in his sight, though not as the basis of deliverance from the wrath to come. Even after the revelation of the gospel it is still true that there will be a day of judgment, and that God will look for good works from his people as the evidence of the genuineness of their faith. We can see how this re-appropriation works in texts like Rom 14:10-12; 1 Cor 3:10-15; 4:1-5; 2 Cor 5:10 and Col 3:23-24. In each case, it is not quite the same as the final judgment expected in post-biblical Jewish literature.<sup>118</sup> It certainly has points of continuity with the Jewish expectation, but in these texts judgment has taken on a Christological coloring. It is a judgment in which Christ, as the risen Lord, reviews the lives of his servants, takes note of the good works they have performed in his name, and rewards them for their faithful service. The purpose of this judgment is not to determine whether Christians will be delivered from wrath and enter the eschatological kingdom,<sup>119</sup> for the subjects of this judgment are already justified, forgiven, and raised in glorified bodies.<sup>120</sup> Rather, this judgment has as its purpose the review of the Christian's overall pattern of life. Some of these texts even go so far as to indicate that the sins we have committed will also come under review, even a kind of judgment – suffering loss of reward, but not bringing us under a sentence of condemnation and wrath.

One of the main purposes of this judgment of believers will be to publicly vindicate their profession of faith by showing that their faith was no dead faith but a

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<sup>118</sup> Contra Yinger, Gathercole, and VanLandingham, who contend that Paul's doctrine of future judgment according to deeds is practically identical to Judaism's. In my view, these scholars do not adequately appreciate the degree to which Paul has *Christologically* reshaped Judaism's doctrine of judgment.

<sup>119</sup> Contra Donfried, "Justification and Last Judgment in Paul," 268, 274.

<sup>120</sup> Gaffin, *By Faith*, 99.

living and active faith that produced good fruit, thus demonstrating that their faith was genuine. As John Murray says, “good works as the evidence of faith ... are therefore the criteria of judgment.”<sup>121</sup> Saving faith in Christ, if it is genuine, is no idle thing but by the operation of the Spirit brings forth the fruit of obedience, good works, and Christ-like righteousness. Although these works are not perfect, they are wrought in us by the Spirit, and will be graciously accepted by God at the day of judgment. By virtue of our union with Christ we will be acknowledged and vindicated by God as his own on the day of judgment. The purpose of this judgment is to publicly vindicate Christians’ profession of faith by bringing their works, performed by the power of the Spirit, to light, and thus demonstrating to the world that it is appropriate that they be granted entrance into the eternal kingdom in which righteousness dwells.<sup>122</sup>

What I am zealous to maintain is that Paul isn’t engaging in this Christological re-appropriation of the doctrine of final judgment here in Rom 2 – except for the very brief hint in v 16 (“as my gospel declares”). His use of the doctrine of final judgment at this stage in his argument is absolute and does not include concepts like “Spirit-wrought obedience,” or “God’s gracious acceptance of our imperfect obedience.” To introduce these concepts at this stage in the argument would be to put the cart before the horse, to smuggle the gospel solution into the description of the problem.

Furthermore, to see Rom 2:13 specifically as teaching a final justification on the basis of the believer’s good works accomplished by the Spirit, would destroy the completed, once-for-all nature of justification as taught in passages like Rom 5:1, 9-10;

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<sup>121</sup> Murray, 1.79.

<sup>122</sup> Stott, 84-84, rightly emphasizes the *public* nature of the judgment.

and 8:1. Once sinners have been justified by faith in Christ, they have received a definitive verdict that places them beyond probation and guarantees the reception of eternal life. A justified person has a free and full assurance of acceptance with God and the hope of glory, not a conditional status conditioned on a life of perseverance in good works. Systematic theologian Cornelis Venema puts it this way:

Justification, in Paul's teaching, is a thoroughly eschatological blessing. It represents the present, definitive declaration of God's favourable verdict concerning those who are joined to his Son by faith. This verdict anticipates and secures the believer's acceptance with God (Rom. 5:1; 8:1). If Romans 2:13 taught a future, eschatological justification, which is based upon the works of faith and not upon the work of Christ alone, the believer's present justification would no longer secure a future reception of eternal life.<sup>123</sup>

The future verdict expected at the last day has been brought forward into the present in the resurrection of Christ and apprehended by faith.<sup>124</sup> By virtue of union with Christ in his substitutionary judgment (death) and vindication (resurrection), the believer has already passed through the fire of judgment and has been raised to eternal life on the other side. Therefore, contra Dunn and Wright, justification must not be subdivided into an initial justification by faith and a future justification dependent on a life of good works. It is true that good works necessarily flow from genuine faith in Christ, so that justification and sanctification are inseparable. Nevertheless, the status of justification itself is not reversible or forfeitable. Whatever future rewards and public vindication may take place on the day of judgment, it will not involve a second justification but will merely be the outworking and public manifestation of a verdict that has already been rendered definitively in the cross and resurrection of Christ.

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<sup>123</sup> Venema, *The Gospel of Free Acceptance in Christ*, 284.

<sup>124</sup> George Eldon Ladd, *A Theology of the New Testament* (rev. Donald A. Hagner; Grand Rapids: Eerdmans, 1993), 482-84.

## BIBLIOGRAPHY

- Achtemeier, Paul J. *Romans*. Interpretation. Atlanta: John Knox, 1985.
- \_\_\_\_\_. “‘Some Things in Them Hard to Understand’: Reflections on an Approach to Paul.” *Interpretation* 38 (1984): 254-267.
- Alletti, Jean-Noël. “Rm 1,18–3,20. Incohérence ou cohérence de l’argumentation paulinienne?” *Biblica* 69 (1988): 54-61.
- Augustine. “On the Spirit and the Letter.” Pages 79-114 in *Nicene and Post-Nicene Fathers, First Series, Volume 5: Saint Augustin: Anti-Pelagian Writings*. Translation by Peter Holmes and Robert Ernest Wallis. Edited by Philip Schaff. Peabody, Mass.: Hendrickson, 1994. Originally published, 1887.
- Barrett, C. K. *The Epistle to the Romans*. Revised Edition. Black’s New Testament Commentary. Peabody, Mass.: Hendrickson, 1991.
- Barth, Karl. *A Shorter Commentary on Romans*. Richmond: John Knox Press, 1959.
- Bassler, Jouette M. *Divine Impartiality: Paul and a Theological Axiom*. Society of Biblical Literature Dissertation Series 59. Chico: Scholars Press, 1982.
- Bayes, Jonathan. *The Weakness of the Law*. Paternoster Biblical and Theological Monographs. Carlisle, U.K.: Paternoster, 2000.
- Bell, Richard H. *No One Seeks for God: An Exegetical and Theological Study of Romans 1,18–3,20*. Wissenschaftliche Untersuchungen zum Neuen Testament 106. Tübingen: Mohr (Siebeck), 1998.
- Bergmeier, Roland. *Das Gesetz im Römerbrief und andere Studien zum Neuen Testament*. Wissenschaftliche Untersuchungen zum Neuen Testament 121. Tübingen: Mohr (Siebeck), 2000.
- Best, Ernest. *The Letter of Paul to the Romans*. Cambridge Bible Commentary. Cambridge: Cambridge University Press, 1967.
- Bird, Michael F. *The Saving Righteousness of God: Studies in Paul, Justification and the New Perspective*. Paternoster Biblical Monographs. Milton Keynes, U.K.; Waynesboro, Ga.: Paternoster, 2007.
- Black, Matthew. *Romans*. New Century Bible. Grand Rapids: Eerdmans, 1973.

Boers, Hendrikus. *The Justification of the Gentiles: Paul's Letter to the Galatians and Romans*. Peabody, Mass.: Hendrickson, 1994.

\_\_\_\_\_. “‘We Who are by Inheritance Jews; Not from the Gentiles, Sinners.’” *Journal of Biblical Literature* 111 (1992): 273-81.

Bornkamm, Günther. “Gesetz und Natur (Röm 2,14-16).” Pages 93-118 in *Studien zu Antike und Urchristentum II*. Beiträge zur evangelischen Theologie 28. München: Chr. Kaiser Verlag, 1963.

Bruce, F. F. *The Letter of Paul to the Romans*. Second Edition. Tyndale New Testament Commentary. Grand Rapids: Eerdmans, 1985.

Bultmann, Rudolf. “Glossen im Römerbrief.” In *Exegetica: Aufsätze zur Erforschung des Neuen Testaments*. Edited by Erich Dinkler. Tübingen: Mohr (Siebeck), 1967.

Byrne, Brendan, S.J. *Romans*. Sacra Pagina 6. Collegeville, Minn.: The Liturgical Press, 1996.

Calvin, John. *The Epistles of Paul the Apostle to the Romans and to the Thessalonians*. Translated by Ross MacKenzie. Edited by D. W. Torrance and T. F. Torrance. Grand Rapids: Eerdmans, 1960.

\_\_\_\_\_. *Institutes of the Christian Religion*. The Library of Christian Classics. Translated by Ford Lewis Battles. Edited by John T. McNeill. Philadelphia: Westminster, 1960.

Carras, George P. “Romans 2,1-29: A Dialogue on Jewish Ideals.” *Biblica* 73 (1992): 183-207.

Chae, Daniel J-S. *Paul as Apostle to the Gentiles*. Paternoster Biblical and Theological Monographs. Carlisle, U.K.: Paternoster, 1997.

Cosgrove, Charles H. “Justification in Paul: A Linguistic and Theological Reflection.” *Journal of Biblical Literature* 106 (1987): 653-70.

Cranfield, C. E. B. *A Critical and Exegetical Commentary on the Epistle to the Romans*. Vol. 1. Edinburgh: T. & T. Clark, 1975.

\_\_\_\_\_. “‘The Works of the Law’ in the Epistle to the Romans.” *Journal for the Study of the New Testament* 43 (1991): 89-101.

Cranford, Michael. “The Possibility of Perfect Obedience: Paul and an Implied Premise in Galatians 3:10 and 5:3.” *Novum Testamentum* 36 (1995): 242-58.

- Das, A. Andrew. *Paul, the Law, and the Covenant*. Peabody, Mass.: Hendrickson, 2001.
- \_\_\_\_\_. *Solving the Romans Debate*. Minneapolis: Fortress, 2007.
- Davies, Glenn. *Faith and Obedience in Romans: A Study in Romans 1–4*. Journal for the Study of the New Testament: Supplement Series 39. Sheffield: JSOT Press, 1990.
- Donfried, Karl Paul. “Justification and Last Judgment in Paul.” Pages 293-313 in *La Notion biblique de Dieu*. Edited by J. Coppens. Bibliotheca Ephemeridum Theologicarum Lovaniensium 41. Gembloux: J. Duculot, 1976. Also found in *Zeitschrift für die neutestamentliche Wissenschaft* 67 (1976): 90-110. Reprint: Karl Paul Donfried, *Paul, Thessalonica, and Early Christianity* (London: T. & T. Clark, 2002), 253-78.
- Dunn, James D. G. “The Dialogue Progresses.” Pages 389-430 in *Lutherische und Neue Paulusperspektive: Beiträge zu einem Schlüsselproblem der gegenwärtigen exegetischen Diskussion*. Edited by Michael Bachmann. Wissenschaftliche Untersuchungen zum Neuen Testament 182. Tübingen: Mohr (Siebeck), 2005.
- \_\_\_\_\_. *The New Perspective on Paul: Collected Essays*. Wissenschaftliche Untersuchungen zum Neuen Testament 185. Tübingen: Mohr (Siebeck), 2005.
- \_\_\_\_\_. *Romans 1–8*. Word Biblical Commentary 38A. Dallas: Word Books, 1988.
- \_\_\_\_\_. *The Theology of Paul the Apostle*. Grand Rapids: Eerdmans, 1998.
- Elliott, Neil. *The Rhetoric of Romans: Argumentative Constraint and Strategy and Paul’s Dialogue with Judaism*. Journal for the Study of the New Testament: Supplement Series 45. Sheffield: Sheffield Academic, 1990.
- Eskola, Timo. *Theodicy and Predestination in Pauline Soteriology*. Wissenschaftliche Untersuchungen zum Neuen Testament 100. Tübingen: Mohr (Siebeck), 1998.
- Fitzmyer, Joseph A., S.J. *Romans: A New Translation with Introduction and Commentary*. The Anchor Bible 33. New York: Doubleday, 1993.
- Flückiger, Felix. “Die Werke des Gesetzes bei den Heiden (nach Röm 2,14ff).” *Theologische Zeitschrift* 8 (1952): 17-42.
- Gaffin, Richard B., Jr. *By Faith, Not by Sight: Paul and the Order of Salvation*. Milton Keynes, U.K.; Waynesboro, Ga.: Paternoster, 2006.
- Garlington, Don B. *Faith, Obedience and Perseverance*. Wissenschaftliche Untersuchungen zum Neuen Testament 79. Tübingen: Mohr (Siebeck), 1994.

- Gathercole, Simon J. "A Law unto Themselves: The Gentiles in Romans 2.14-15 Revisited." *Journal for the Study of the New Testament* 85 (2002): 27-49.
- \_\_\_\_\_. *Where is Boasting? Early Jewish Soteriology and Paul's Response in Romans 1-5*. Grand Rapids: Eerdmans, 2002.
- Haldane, Robert. *Commentary on Romans*. New York: R. Carter & Brothers, 1853.  
Reprint: Grand Rapids: Kregel, 1988.
- Hodge, Charles. *A Commentary on Romans*. Revised Edition, 1864. Reprint: Carlisle, Pa.: Banner of Truth, 1972.
- Ito, Akio. "Romans 2: A Deuteronomistic Reading." *Journal for the Study of the New Testament* 59 (1995): 21-37.
- Jewett, Robert. *Romans: A Commentary*. Hermeneia. Minneapolis: Fortress, 2007.
- Käsemann, Ernst. *Commentary on Romans*. Translated and edited by Geoffrey W. Bromiley. Grand Rapids: Eerdmans, 1980.
- Keck, Leander E. *Romans*. Abingdon New Testament Commentaries. Nashville: Abingdon, 2005.
- Kim, Seyoon. *Paul and the New Perspective: Second Thoughts on the Origin of Paul's Gospel*. Grand Rapids: Eerdmans, 2002.
- Knox, John. *The Epistle to the Romans*. Pages 353-668 in *The Interpreter's Bible*, Vol. 9. New York: Abingdon, 1954.
- König, Adrio. "Gentiles or Gentile Christians? On the Meaning of Romans 2:12-16." *Journal of Theology for Southern Africa* 15 (1976): 53-60.
- Kuhr, Friedrich. "Römer 2.14f. und die Verheissung bei Jeremia 31.31ff." *Zeitschrift für die neutestamentliche Wissenschaft* 55 (1964): 243-61.
- Kuss, Otto. *Der Römerbrief*. Regensberg: Verlag Friedrich Pustet, 1957.
- Ladd, George Eldon. *A Theology of the New Testament*. Revised Edition. Revised by Donald A. Hagner. Grand Rapids: Eerdmans, 1993.
- Lamp, Jeffrey S. "Paul, the Law, Jews, and Gentiles: A Contextual and Exegetical Reading of Romans 2:12-16." *Journal of the Evangelical Theological Society* 42 (1999): 37-51.
- Lietzmann, Hans. *Die Briefe des Apostels Paulus: An die Römer*. Second Edition. Handbuch zum Neuen Testament. Tübingen: Mohr (Siebeck), 1919.

- Lincoln, Andrew T. "From Wrath to Justification: Tradition, Gospel, and Audience in the Theology of Romans 1:18–4:25." Pages 130-59 in *Pauline Theology, Vol. III: Romans*. Edited by David M. Hay and E. Elizabeth Johnson. Minneapolis: Fortress, 1995.
- Longenecker, Bruce W. *Eschatology and the Covenant: A Comparison of 4 Ezra and Romans 1–11*. Journal for the Study of the New Testament: Supplement Series 57. Sheffield: JSOT Press, 1991.
- Martens, John W. "Romans 2:14-16: A Stoic Reading." *New Testament Studies* 40 (1994): 55-67.
- Meyer, H. A. W. *Critical and Exegetical Hand-Book to the Epistle to the Romans*. Translated by John C. Moore, Edwin Johnson, and William P. Dickson. New York: Funk & Wagnalls, 1884.
- Moo, Douglas J. *The Epistle to the Romans*. New International Commentary on the New Testament. Grand Rapids: Eerdmans, 1996.
- \_\_\_\_\_. "'Law,' 'Works of the Law,' and Legalism in Paul." *Westminster Theological Journal* 45 (1983): 90-99.
- \_\_\_\_\_. "Romans 2: Saved Apart from the Gospel?" Pages 137-45 in *Through No Fault of Their Own: The Fate of Those Who Have Never Heard*. Edited by William V. Crockett and James G. Sigountos. Grand Rapids, Baker, 1991.
- Morris, Leon. *The Epistle to the Romans*. Pillar New Testament Commentary. Grand Rapids: Eerdmans, 1988.
- Mounce, Robert H. *Romans*. New American Commentary 27. Nashville: Broadman & Holman, 1995.
- Mundle, Wilhelm. "Zur Auslegung von Röm 2,13ff." *Theologische Blätter* 13 (1934): 249-56.
- Murray, John. *The Epistle to the Romans*. New International Commentary on the New Testament. Two volumes in one. Grand Rapids: Eerdmans, 1968.
- Räisänen, Heikki. *Paul and the Law*. Philadelphia: Fortress, 1983.
- Sanday, William and Arthur C. Headlam. *A Critical and Exegetical Commentary on the Epistle to the Romans*. Fifth Edition. Edinburgh: T. & T. Clark, 1902.
- Sanders, E. P. *Paul, the Law, and the Jewish People*. Minneapolis: Fortress, 1983.

Schreiner, Thomas R. *The Law and Its Fulfillment: A Pauline Theology of Law*. Grand Rapids: Baker, 1993.

\_\_\_\_\_. *Romans*. Baker Exegetical Commentary on the New Testament. Grand Rapids: Baker, 1998.

Shedd, William G. T. *A Critical and Doctrinal Commentary upon the Epistle of St. Paul to the Romans*. New York: Charles Scribner's Sons, 1879.

Snodgrass, Klyne R. "Justification by Grace – to the Doers: An Analysis of the Place of Romans 2 in the Theology of Paul." *New Testament Studies* 32 (1986): 72-93.

Souček, Josef B. "Zur Exegese von Röm. 2,14ff." Pages 99-113 in *Antwort: Karl Barth zum siebzigsten Geburtstag am 10. Mai 1956*. Edited by E. Wolf. Zollikon-Zürich: Evangelischer Verlag, 1956.

Stott, John R. W. *The Message of Romans: God's Good News for the World*. The Bible Speaks Today. Downers Grove, Ill.: Inter-Varsity, 1994.

Stowers, Stanley K. *The Diatribe and Paul's Letter to the Romans*. Society of Biblical Literature Dissertation Series 57. Chico: Scholars Press, 1981.

Stuhlmacher, Peter. *Paul's Letter to the Romans: A Commentary*. Translated by Scott. J. Hafemann. Edinburgh: T. & T. Clark, 1994.

Thielman, Frank. *From Plight to Solution: A Jewish Framework to Understanding Paul's View of the Law in Galatians and Romans*. Supplements to Novum Testamentum 61. Leiden: Brill, 1989.

Tobin, Thomas H., S.J. *Paul's Rhetoric in Its Contexts: The Argument of Romans*. Peabody, Mass.: Hendrickson, 2004.

VanLandingham, Chris. *Judgment and Justification in Early Judaism and the Apostle Paul*. Peabody, Mass.: Hendrickson, 2006.

Venema, Cornelis P. *The Gospel of Free Acceptance in Christ: An Assessment of the Reformation and New Perspectives on Paul*. Edinburgh: Banner of Truth, 2006.

Vos, Geerhardus. "The Alleged Legalism in Paul's Doctrine of Justification." Pages 383-99 in *Redemptive History and Biblical Interpretation: The Shorter Writings of Geerhardus Vos*. Edited by Richard B. Gaffin, Jr. Phillipsburg, N.J.: Presbyterian and Reformed, 1980. Reprinted from *The Princeton Theological Review* 1 (1903): 161-79.

- Watson, Francis. *Paul, Judaism, and the Gentiles: A Sociological Approach*. Society for New Testament Studies Monograph Series 56. Cambridge: Cambridge University Press, 1986.
- \_\_\_\_\_. *Paul and the Hermeneutics of Faith*. London: T. & T. Clark, 2004.
- Westerholm, Stephen. *Perspectives Old and New on Paul: The “Lutheran” Paul and His Critics*. Grand Rapids: Eerdmans, 2004.
- Wilckens, Ulrich. *Der Brief an die Römer*. Three Volumes. Evangelisch-Katholischer Kommentar zum Neuen Testament 6. Zürich: Benziger; Neukirchener-Vluyn: Neukirchener, 1978.
- Wright, N. T. “The Law in Romans 2.” Pages 131-50 in *Paul and the Mosaic Law*. Edited by James D. G. Dunn. Tübingen: Mohr (Siebeck), 1996; Grand Rapids: Eerdmans, 2001.
- \_\_\_\_\_. *The Letter to the Romans: Introduction, Commentary, and Reflections*. Pages 393-770 in *The New Interpreter’s Bible*, Vol. 10. Edited by Leander E. Keck. Nashville: Abingdon, 2002.
- Ye, Sungchul. *Paul, the Doers of the Law, and Gentiles: A Study of Romans 2:12-16*. Ph.D. dissertation, Fuller Theological Seminary, 2004.
- Yinger, Kent L. *Paul, Judaism, and Judgment According to Deeds*. Society for New Testament Studies Monograph Series 105. Cambridge: Cambridge University Press, 1999.
- Ziesler, John. *Paul’s Letter to the Romans*. TPI New Testament Commentaries. London: SCM Press; Philadelphia: Trinity Press International, 1989.