

***Did Paul Believe in  
Justification by Works?  
Another Look at Romans 2***

THOMAS SCHREINER  
BETHEL THEOLOGICAL SEMINARY  
ST. PAUL, MINNESOTA

INTRODUCTION

The controversy over Paul's theology on the law shows no sign of abating, and it will probably continue since his view on the law cannot be assigned to the periphery of his thought and is fundamental for understanding his gospel. Another reason for the ongoing debate is the complexity and difficulty of explicating Paul's stance on the law. The controversy and complexity of the issue are exemplified in Romans 2. Does Paul seriously believe that some will be justified by their works (Rom 2:6-7, 10, 13, 26-27)? If he does, how does this square with his assertion that no one can be justified by "works of law" (Rom 3:20, 28; Gal 2:16; cf. Gal 3:2, 5, 10)? I shall defend the thesis that Paul believes works are necessary for justification, that these works can only be done by Christians, and that such a position does not contradict Paul's claim elsewhere that no one can be justified by "works of law."

SURVEY OF INTERPRETATION

Before I attempt to sustain my interpretation from the text, a brief survey and critique of some contemporary interpretations of Romans 2 will be conducted.<sup>1</sup>

1. For a history of interpretation see M. Lackmann, *Vom Geheimnis der Schöpfung: Die Geschichte der Exegese von Römer I, 18-23, II, 14-16 und Acta XIV, 15-17, XVII, 22-29 vom 2. Jahrhundert bis zum Beginn der Orthodoxie* (Stuttgart: Evangelisches Verlagswerk, 1952) 95-140, 212-235. A brief survey of interpretation is found in J. Reidl, "Die Auslegung von R 2, 14-16 in Vergangenheit und Gegenwart," *Studiorum Paulinorum*

*Paul's View as Contradictory*

Some scholars argue that Paul's belief in Romans 2 that Gentiles can be justified by obeying the law contradicts his assertion elsewhere that no one can keep the law.<sup>2</sup> E. P. Sanders thinks that in Romans 2 Paul utilizes a synagogue sermon from diaspora Judaism, which does not harmonize with his statements about the law elsewhere, and the natural conclusion from Romans 2 alone is that one should practice the law in order to be a true Jew.<sup>3</sup> Both Sanders and Heikki Räisänen argue that Paul is guilty of making some statements about the Jews in Romans 2 which are exaggerations, for not all Jews are guilty of stealing, adultery, and robbing temples!<sup>4</sup> Räisänen suggests that since Paul's purpose in Romans 2 is to attack the Jews, in the course of his attack he implicitly and inconsistently assumes that fulfilling the law is possible for unbelieving Gentiles.<sup>5</sup> The contradiction with what Paul says elsewhere demonstrates that he is not a consistent thinker.<sup>6</sup>

Sanders and Räisänen are right in seeing tensions between this text and other Pauline statements. Their claim to see a contradiction,

*Paulinorum Congressus Internationalis Catholicus 1961* (AnBib 17-18; Rome: Pontifical Biblical Institute, 1963) 1.271-81. For a very full bibliography both of the history of interpretation and of modern exegesis see K. N. Snodgrass, "Justification by Grace--To the Doers: An Analysis of the Place of Romans 2 in the Theology of Paul," *NTS* 32 (1986) 87-93.

2. W. Wrede, *Paulus* (2d ed.; Tübingen: Mohr-Siebeck, 1907) 49; W. Joest, *Gesetz und Freiheit: Das Problem des tertius usus legis bei Luther und die neutestamentliche Parainese* (Göttingen: Vandenhoeck & Ruprecht, 1956) 169-76; H. Räisänen, *Paul and the Law* (Philadelphia: Fortress, 1983) 106-7; E. P. Sanders, *Paul, the Law, and the Jewish People* (Philadelphia: Fortress, 1983) 123-35; O. Pfleiderer, *Der Paulinismus: Ein Beitrag zur Geschichte der urchristlichen Theologie* (2d ed.; Leipzig: Reiland, 1890) 281-83. C. J. Roetzel (*Judgement in the Community: A Study of the Relationship between Eschatology and Ecclesiology in Paul* [Leiden: Brill, 1972] 177-78) sees no contradiction, but says that the attempt to harmonize justification by faith and judgment according to works troubles western theologians with their predilection for logical consistency, but was of no concern for Paul. O. Michel (*Der Brief an die Römer* [MeyerK; Göttingen: Vandenhoeck & Ruprecht, 1966] 77) also sees no contradiction, although he claims that only God knows how judgment by works coheres with justification by faith. R. Pregnant ("Grace and Recompense: Reflections on a Pauline Paradox," *JAAR* 47 [1979] 73-96) finds the problem to be insoluble and attempts to reconcile it with a Whiteheadian hermeneutic. It is hardly clear how his resolution works logically, and he ends up denying an apocalyptic judgment in Paul! J. C. O'Neill (*Paul's Letter to the Romans* [Harmondsworth, England: Penguin, 1975] 47-48, 53-54, 264) thinks Romans 2 cannot harmonize with Paul's theology, and thus claims that the passage is a later interpolation, but his solution here has not convinced many.

3. Sanders, *Paul, the Law*, 123, 129.

4. Sanders, *Paul, the Law*, 124-25; Räisänen, *Paul and the Law*, 98-101.

5. Räisänen, *Paul and the Law*, 106.

6. Räisänen, *Paul and the Law*, 106-8; Sanders, *Paul, the Law*, 124.

however, is not finally persuasive. Even if Paul is using a synagogue sermon in Romans 2 (which is itself questionable), the use of tradition by him signals his agreement with it. Sanders objects that this passage is an exception to the above principle since there is nothing distinctively Christian about the pericope, and nowhere else does Paul make salvation dependent upon the law.<sup>7</sup> But this argument is flawed, for even Sanders acknowledges that Paul uses tradition in vice and virtue lists which are not distinctively Christian, and it is artificial to say that the tradition employed fits with Paul only if it has a Christian stamp, for Paul as a Christian was still deeply influenced by his Jewish heritage. The central issue, however, is whether it accords with Paul's thought to make salvation dependent upon obeying the law. I shall argue below that such a position is not a contradiction in his thinking.

The claim that Paul makes exaggerated charges against the Jews which do not accord with reality is also unpersuasive. It is simply not true to say that in Romans 2 Paul charges *every* Jew with adultery, stealing, and robbing temples. These infractions are listed as *illustrations* of the principle that the Jews do not keep the law which they treasure and teach. Paul uses colorful examples in order to drive his main point home that the Jews fail to keep the law, but it is illegitimate to conclude from his illustrations that he is saying that all Jews are guilty of the specific infractions he mentions. His point is that all Jews stand condemned because they fail to perform perfectly all which the law says. The problem with Sanders' and Räisänen's interpretation is that they fail to distinguish between the illustrations Paul uses and the main point which is being supported by these illustrations. That Paul's main point here is that all Jews deserve judgment because they fail to observe the law perfectly is supported by Rom 3:9-20 where Paul argues that no one is righteous by "works of law" because all sin. Thus, the illustrations are not introduced for the purpose of saying that all Jews are guilty of these specific sins, but in order to support the thesis that all Jews sin.

Finally, the contention that Paul is inconsistent is called into question by the very next chapter where he says no one can be righteous by "works of law" (3:20, 28); and it is quite unlikely that he has forgotten or failed to see the tension with what he has just written in Romans 2.<sup>8</sup> Indeed, Rom 3:19-20 functions as the concluding statement for all of 1:18-3:18, and in this text a predominant theme

7. Sanders, *Paul, the Law*, 131-32.

8. C. E. B. Cranfield ("Giving a Dog a Bad Name: A Note on H. Räisänen's Paul and the Law," *JSNT* 38 [1990] 77-85) uses Romans 2 as his case study in subjecting Räisänen's study to scrutiny, concluding that the latter opts too simplistically for contradiction in Paul's thought.

is that all people without exception are sinners (cf. 3:9-18). It follows, then, that the statements which say no one can keep the law and that some keep the law to the extent that they are justified are found in the very same context. It is possible that Paul did not perceive the "contradiction" between these two kinds of statements, but it is more probable, since he was an intelligent person, that he was aware of the tension and did not see a contradiction here.

### *Sociological Solution*

Francis Watson has recently attempted to explain Romans 2 from a sociological perspective.<sup>9</sup> Paul wanted, according to Watson, to convince believers in Rome to break with the Jewish community. Paul's ultimate goal was to transform the Roman community from a reform movement within Judaism into a sect which would break with Judaism. Thus, Paul argues in Romans 2 that Gentile Christians are "true Jews" because they obey the law, while the Jews who possess the law do not obey it, deluding themselves into thinking they will be saved by grace alone. The assertion in Romans 2 that one is justified by works does not contradict the statement (Rom 3:20) that justification cannot be obtained by "works of law," according to Watson, for in the latter passage Paul's point is that one does not need to follow the way of life of the Jewish people to be justified.<sup>10</sup> Paul's purpose is the same in both passages, says Watson: to show Roman Christians that they should separate from the Jewish community since they already possess the privileges claimed by the Jews.

Watson takes seriously the statements concerning Gentile obedience to the law in Romans 2, but his thesis as a whole is not convincing. He drives a wedge between sociology and theology, virtually forgetting the latter. Such an approach is too one dimensional in its method of exegesis.<sup>11</sup>

In addition, he minimizes Paul's exhortations to Gentile Christians in Romans 11 and 14:1-15:13.<sup>12</sup> In Rom 11:17-24 Paul warns

9. *Paul, Judaism and the Gentiles* (SNTSMS 56; Cambridge: Cambridge University Press, 1986) 109-22.

10. *Ibid.*, 129-30.

11. So J. M. G. Barclay, *Obedying the Truth: A Study of Paul's Ethics in Galatians* (Edinburgh: T. & T. Clark, 1988) 238-39, 242; W. R. Campbell, "Did Paul Advocate Separation from the Synagogue? A Reaction to Francis Watson: *Paul, Judaism and the Gentiles: A Sociological Approach*," *SJT* 42 (1989) 461-62.

12. See Watson (*Paul, Judaism and the Gentiles*, 94-98, 168-73) for his discussion of these texts. Such exhortations have led some scholars to see Paul as primarily addressing Gentiles in Romans. So H. W. Bartsch, "The Historical Situation of Romans," *Encounter* 33 (1972) 329-38; W. S. Campbell, "Why Did Paul Write Romans?" *ExpTim* 85 (1974) 264-69; *idem*, "Romans 3 as the Key to the Structure and Thought of the Letter,"

the Gentiles against being proud of their ingrafting onto the olive tree while the Jews have been cut off. There is no indication that the primary concern here is separation from the Jewish community; rather, Paul seems concerned that the Gentiles may think the Jews are cut off forever from the olive tree (11:23ff.).<sup>13</sup> Romans 11 is the climax of chapters 9-11, and thus it is probable that the exhortations to the Gentiles are a crucial part of his argument.<sup>14</sup> Watson, however, argues that in the light of the rest of Romans, chapter 11 should be understood as directed mainly to the Jews.<sup>15</sup> Such a thesis runs aground on the fact that the specific exhortations in the text are directed to Gentiles. Watson's argument here seems to be an example of explaining away clear evidence to defend an a priori thesis.

Watson's explanation of Rom 14:1-15:13 is equally unconvincing. He stresses how much the Jewish Christians had to give up in order to be part of the Christian community. But it is plain in reading this section that the emphasis lies on the responsibility of Gentiles (14:1, 13-22; 15:1-4) to accept the Jewish Christians who were weak in faith.<sup>16</sup> By stressing the responsibility of the weak, Watson turns the emphasis of the text on its head. If the main concern in Romans were the desire for Christian congregations to separate from the Jewish community, one would expect Paul to encourage Gentiles to distance themselves from Jews who continued to adhere to Jewish cultural practices. This would effectively separate Christian congregations from Judaism. Since Paul focuses on the responsibility of Gentile believers towards Jews, Watson's analysis of the situation is called into question. It is also telling that Watson devotes over fifty pages to Romans 2-8, whereas only four pages are found on Rom 14:1-15:13. This suggests that his reconstruction fails to weigh appropriately the

*NovT* 23 (1981) 22-40; idem, "The Freedom and Faithfulness of God in Relation to Israel," *JSNT* 13 (1981) 27-45.

13. Campbell ("Separation from the Synagogue," 465) says that Watson's thesis only works "by dismissing the whole of Rom. 11." Campbell overemphasizes his point here, although it is surely the case that Watson underestimates the place of Romans 11.

14. Campbell ("Separation from the Synagogue," 465) rightly notes that very few scholars are persuaded that Romans was addressed to "a Jewish Christian minority." Watson's thesis seems to depend upon this very reconstruction in his understanding of Romans 9-11 and 14-15. The discussion of the situation which stimulated Romans is complex and disputed. For helpful inroads into the discussion see K. P. Donfried, ed., *The Romans Debate* (rev. ed.; Peabody: Hendrickson, 1991); A. J. M. Wedderburn, *The Reasons for Romans* (Edinburgh: T. & T. Clark, 1988).

15. Watson, *Paul, Judaism and the Gentiles*, 171.

16. I am in agreement with Watson that the weaker Christians are primarily Jewish, while the strong are Gentile. For a good defense of this view see J. D. G. Dunn's commentary on this section, *Romans* (WBC; Waco: Word, 1988) 2.794-853.

whole of Romans.<sup>17</sup> One can also query the wisdom of locating the sociological situation of Romans in chapters 2-8, especially since Paul's specific exhortations to Gentiles in chapters 9 and 14-15 are forced into a procrustean bed by Watson to sustain the hypothesis derived from the earlier chapters.

### *Obedience is Hypothetical*

A number of scholars argue that what Paul says here about obedience to the law is merely hypothetical, that is, only perfect obedience would gain righteousness and such obedience is not practically possible.<sup>18</sup> A complementary way of understanding the passage sees Paul as emphasizing that Gentiles possess their own standard of judgment (Rom 2:12-16), and since they fail to meet that standard, or only obey the law occasionally they will be judged.<sup>19</sup> Interpreters

17. On Romans 2-8 see Watson, *Paul, Judaism and the Gentiles*, 106-59, while on Rom 14:1-15:13 see pp. 94-98.

18. H. Lietzmann, *An die Römer* (HNT; Tübingen: Mohr-Siebeck, 1928) 39-40, 44; U. Wilckens, *Der Brief an die Römer* (EKK; Neukirchen-Vluyn: Neukirchener Verlag, 1978) 1.132-33, 145; J. Knox, *Romans* (IB; New York: Abingdon, 1954) 409, 418-19; O. Kuss, *Der Römerbrief* (Regensburg: F. Pustet, 1957) 1.64-68, 90; G. Bornkamm, "Gesetz und Natur (Rom 2, 14-16)," *Studien zu Antike und Urchristentum* (BEvT 28; München: Chr. Kaiser, 1959) 2.110; F. F. Bruce, *The Letter of Paul to the Romans* (TNTC; 2d ed.; Grand Rapids: Eerdmans, 1985) 90; R. A. Harrisville, *Romans* (ACNT; Minneapolis: Augsburg, 1980) 49-50; E. Jungel, "Das Gesetz zwischen Adam und Christus: Eine theologische Studie zu Rom 5, 12-21," *ZTK* 60 (1963) 72-74; F. Kuhr, "Römer 2. 14f. und die Verheissung bei Jeremia 31. 31ff.," *ZNW* 55 (1964) 252-61; A. van Dülmen, *Die Theologie des Gesetzes bei Paulus* (SBM 5; Stuttgart: Katholisches Bibelwerk, 1968) 76-82; F. Thielman, *From Plight to Solution: A Jewish Framework for Understanding Paul's View of the Law in Galatians and Romans* (NovTSup 61; Leiden: Brill, 1989) 94-96; B. L. Martin, *Christ and the Law in Paul* (NovTSup 62; Leiden: Brill, 1989) 40-41, 92-93; J.-N. Aletti, "Rm 1, 18-3. 20: Incoherence ou coherence de l'argumentation paulinienne?" *Bib* 69 (1988) 47-62; D. Moo, *Romans 1-8* (WEC; Chicago: Moody, 1991) 139-41, 166-68.

19. This category overlaps with the previous one, and thus some scholars can be found promulgating both views. O. Kuss, "Die Heiden und die Werke des Gesetzes (nach Rom 2, 14-16)," *MTZ* 5 (1954) 85-90, 95, 98; Kuhr, "Römer 2. 14f.," 255; Bornkamm, "Gesetz und Natur," 93-110; F.-J. Leenhardt, *The Epistle to the Romans* (London: Lutterworth, 1961) 78, 83; P. Althaus, *Der Brief an die Römer* (NTD; Göttingen: Vandenhoeck & Ruprecht, 1978) 25, 28; A. Nygren, *Commentary on Romans* (Philadelphia: Fortress, 1949) 124, 130; L. Morris, *The Epistle to the Romans* (Grand Rapids: Eerdmans, 1988) 124; L. Mattern, *Das Verstandnis des Gerichtes bei Paulus* (ATANT 47; Zurich: Zwingli, 1966) 123, 130-33; E. Synofzik, *Die Gerichts und Vergeltungsaussagen bei Paulus: Eine traditions-geschichtliche Untersuchung* (GTA 8; Göttingen: Vandenhoeck & Ruprecht, 1977) 80-83; J. M. Bassler, *Divine Impartiality: Paul and a Theological Axiom* (SBLDS 59; Chico: Scholars, 1982) 141-45; R. Mohrlang, *Matthew and Paul: A Comparison of Ethical Perspectives* (SNTSMS. 48; Cambridge: Cambridge, 1984) 162-63 n. 57; J. C. Yates, "The Judgment of the Heathen: The Interpretation of Article XVIII and Romans 2. 12-16," *Churchman* 100 (1986) 220-30; W. Schmithals, *Der Römerbrief Ein Kommentar*

who support these views frequently point out that the purpose of Rom 1:18-3:20 is to show that all are under sin, not that some are righteous.

The theory that Paul is speaking hypothetically is a much more likely solution than the first two we have examined. Adherents to this view are correct in saying that Paul demanded perfect obedience for justification, and that he thought such perfect obedience was impossible. It is certainly possible, then, that the call to perform good works for justification is simply a rhetorical statement.<sup>20</sup> Paul could be saying that one must perform good works to be justified, but the flow of the argument reveals that he believes no one can do the necessary good works. Nonetheless, even though this interpretation is a promising one, the textual arguments against both the hypothetical interpretation and the view that Paul is only emphasizing the judgment of both Jews and Gentiles are decisive.

It is quite likely in Rom 2:26-27 that Paul is speaking of Gentiles who really fulfill the law. This interpretation is supported by Rom 2:28-29 which provides the ground (γάρ) for vv. 26-27. In particular, v. 29 grounds such Gentile obedience in the work of the Holy Spirit. By appealing to the work of the Holy Spirit Paul shows that he is thinking of actual obedience, and is not employing a hypothetical argument.

When Paul refers to repayment according to works (Rom 2:6), he is not thinking of the repayment of judgment only. This is clear from the chiasmus in vv. 7-10 which has both judgment *and eternal* life within its purview. The promise of eternal life for those who do good works could possibly be hypothetical, but there is no evident indication in the text that Paul is speaking hypothetically. Thus, a better conclusion is that Paul believes some people do good works and thereby receive eternal life.

Judgment according to works is an integral part of Paul's theology elsewhere.<sup>21</sup> For example, in Gal 5:21 he states that those who practice the "works of the flesh" will be excluded from the kingdom

(Gütersloh: Mohn, 1988) 87-88, 91-93; 101; R. Walker, "Das Heiden und das Gericht: Zur Auslegung von Romer 2, 12-16," *EvT* 20 (1960) 302-14.

20. Aletti especially makes a good case for this view. See n. 18 above.

21. For some major studies on the place of works at the last judgment see F. V. Filson, *St. Paul's Concept of Recompense* (UNT 21; Leipzig: J. C. Hinrichs'sche Buchhandlung, 1931); Mattern, *Das Verständnis des Gerichtes*; Roetzel, *Judgement in the Community*; K. P. Donfried, "Justification and Last Judgment in Paul," *ZNW* 67 (1976) 90-110; Synofzik, *Gerichts und Vergeltungsaussagen bei Paulus*; J. Gundry Volf, *Paul and Perseverance: Staying in and Falling Away* (WUNT 37; Tübingen: Mohr-Siebeck, 1990). Cf. also N. M. Watson, "Justified by Faith: Judged by Works—an Antimony?" *NTS* 29 (1983) 209-21.

of God. And in 1 Cor 6:9 the ἄδικοι are threatened with the same judgment, and this is clearly a warning to the believing community which was acting unrighteously (ὕμεις ἄδικεῖτε, 1 Cor 6:8) by engaging in lawsuits. Judgment according to works is not some relic from Paul's Jewish past. It was a vital part of his theology. Both Gal 5:21 and 1 Cor 6:8-9 demonstrate that those who profess to be part of the Christian community but persist in sin are threatened with exclusion from the kingdom of God. Apparently, Paul believed that works in some sense were necessary for eternal life. The statement in Gal 5:21 is especially significant because in this letter he has emphasized that no one can be justified by "works of law" (Gal 2:16; cf. 3:2, 5, 10). He still maintains, nevertheless, that good works are essential for entrance into the kingdom of God (cf. 2 Cor 5:10).

### *Pre-Christian Gentiles*

Finally, it is argued that Paul is speaking of pre-Christian Gentiles who observe the law and are justified by their obedience.<sup>22</sup> This justification by works does not contradict Rom 3:20, for it is not an attempt to earn salvation by works as in the latter passage, nor is Romans 2 speaking of perfect obedience. What Paul has in mind are works which stem from faith and the work of the Holy Spirit.

This interpretation possesses a number of similarities with my view that Paul is speaking of Christians who obey the law. Both views stress that obedience is necessary for salvation, that such obedience is not the result of self-effort but the work of the Holy Spirit, and that such obedience is not the earning of salvation by good works but the result of faith. The point of controversy is whether Paul is speaking of Christians or pre-Christians in the text. The latter view seems less likely for two reasons:

First, Paul has just stressed in Rom 1:18-32 that Gentiles who have received a revelation of God through the created order suppress and distort the revelation given to them. There is no evidence of a positive response by unbelievers to natural revelation in Paul. Instead, the time previous to the reception of the gospel is one of sin and the forbearance of God (cf. Rom 3:25-26; 10:14-17).<sup>23</sup>

Second, even though Snodgrass rightly says the Spirit worked effectively in some before the Christian era,<sup>24</sup> what Paul emphasizes

22. Snodgrass, "To the Doers," 72-93; J.-M. Cambier, "Le jugement de tous les hommes par Dieu seul, selon la vérité dans Rom 2. 1-3. 20," *ZNW* 67 (1976) 187-213; C. K. Barrett, *A Commentary on the Epistle to the Romans* (HNTC; New York: Harper & Row, 1957) 45-52, 58-61; G. N. Davies, *Faith and Obedience in Romans: A Study in Romans 1-4* (JSNTSup 39; Sheffield: JSOT, 1990) 53-70.

23. So Moo, *Romans 1-8*, 121-24.

24. "To the Doers," 81.

in his theology is the remarkable increase of the Spirit's activity in the new covenant. Thus, the glory of the Mosaic covenant is eclipsed in light of a greater glory of the new covenant (2 Cor 3:10). Indeed, Paul generally speaks of the old era in negative terms: "ministry of death" (2 Cor 3:7), "ministry of condemnation" (2 Cor 3:9), to be "under law" is equated with being under the power of sin (Rom 6:14-15; Gal 3:21-22; 5:18), and the era of law is one of infancy compared to the full inheritance now available (Gal 3:23-4:7). This is not to deny the Spirit's activity under the old covenant, nor is the claim that the Mosaic covenant was legalistic. The issue is that, according to Paul, the work of the Spirit was minimal in the old covenant in comparison to the new, for generally speaking the covenant with Moses ended in failure, while with the dawn of the new covenant the law can now be obeyed by the power of the Spirit.<sup>25</sup>

It seems unlikely, therefore, that when Paul speaks of the work of the Spirit (Rom 2:29) that he would be thinking of obedience previous to the coming of the gospel since the thrust of his teaching (in accord with both the OT and other Jewish literature of the Second Temple Period)<sup>26</sup> is that the work of the Spirit is a mark of the new age, while the old era was one in which sin and failure were dominant. In addition, since the γράμμα—πνεῦμα contrast elsewhere in Paul (2 Cor 3:6; Rom 7:6) locates the work of the Spirit in the new age, a similar idea is probably in view in our passage.

## WORKS AND JUDGMENT IN ROMANS 2

The idea that Paul is speaking of Christians who obey the law in Romans 2, however, must be sustained by an exegesis of the text. I shall argue that Paul has such Christian obedience in view in Rom 2:7, 10, 26-29. What makes my interpretation different from many scholars who agree that Christian Gentiles are being described in Rom 2:7, 10, and 2:26-29 is that I think *nonbelieving* Gentiles who will face condemnation are being described in Rom 2:14-15.<sup>27</sup> The

25. For support of this thesis in Galatians and Romans see Thielman, *From Plight to Solution*, 46-116.

26. So Thielman, *From Plight to Solution*, 28-45.

27. Most scholars who support the Gentile Christian interpretation also see Gentile Christians in view in Rom 2:14-15. For this view see W. Mundle, "Zur Auslegung von Röm 2, 13ff," *Theologische Blätter* 13 (1934) 249-56; F. Flückiger, "Die Werke des Gesetzes bei den Heiden (nach Röm 2, 14ff)," *TZ* 8 (1952) 17-42; K. Barth, *A Shorter Commentary on Romans* (Richmond: John Knox, 1959) 36-39; idem, *Church Dogmatics* (Edinburgh: T. & T. Clark, 1956) 1.2.304; J. B. Souček, "Zur Exegese von Röm. 2. 14ff.," *Antwort*, (Festschrift K. Barth; Zollikon-Zürich: Evangelischer Verlag, 1956) 99-113; A. König, "Gentiles or Gentile Christians? On the Meaning of Romans 2. 12-16," *Journal of Theology for Southern Africa* 15 (1976) 53-60; C. E. B. Cranfield, *The Epistle to the*

reason this chapter is so difficult, then, is that Paul describes both *believing and nonbelieving* Gentiles in the same chapter. Obviously, if Christian Gentiles were being portrayed in vv. 14-15, such a view would not affect my overall understanding of Paul's theology on this question since I see Christian Gentiles as in view in vv. 7, 10 and 26-29. It is important, though, to distinguish Rom 2:14-15 from Rom 2:7, 10, 26-29 because many scholars think that if they can show that Paul is describing nonbelievers in vv. 14-15, then they have proved that Paul is not describing believers in vv. 7, 10, and 26-29. Such an approach is flawed, for to show that nonbelievers are in view in vv. 14-15 does not prove that unbelieving Gentiles are also in the purview of vv. 7, 10, and 26-29. I shall try to demonstrate from the text that Christian obedience is being portrayed in Rom 2:7, 10, and 26-29, but nonbelieving Gentiles are being described in 2:14-15.

Before we examine the specific texts relevant to our topic in Romans 2 the general context of the section needs to be established. The primary purpose of Romans 2 is to prove that the Jews are guilty before God, for they have transgressed the revelation they have received,<sup>28</sup> just as the Gentiles have rejected the revelation they have received (1:18-32). The following arguments support the idea that Gentiles are particularly in Paul's mind in 1:18-32 and Jews in 2:1-16.<sup>29</sup>

*Romans* (ICC; Edinburgh: T. & T. Clark, 1975) 1.152-62, 173-76. Others express more nuanced views: E. Käsemann (*Commentary on Romans* [Grand Rapids: Eerdmans, 1980] 58) accepts repayment of works (Rom 2:6) as part of Paul's gospel, arguing that: it accords with the transformative power of the gift of righteousness. He understands 2:14-16 to refer to unbelieving Gentiles (62-65), v. 26 to be fictional (73-74), and vv. 28-29 as a reference to Gentile Christians (75-77). The strained nature of Käsemann's exegesis is rightly pointed out by Sanders (*Paul, the Law*, 126-27), Watson (*Paul, Judaism and the Gentiles*, 118) and Snodgrass ("To the Doers," 74). J. Murray (*The Epistle to the Romans* [NICNT; Grand Rapids: Eerdmans, 1959] 1.71, 78) rules out justification by works as impossible. In 2:14-15 non-Christians are being described (1.73-75), but in vv. 26-29 Paul is thinking of believing Gentiles (1.86, 88-89). H. Schlier (*Der Römerbrief* [HTKNT; Freiburg: Herder, 1977] 77-79, 88) says unbelieving Gentiles are designated in 2:14-15, while in v. 27 Paul passes unconsciously into describing Gentile Christians. The view that is closest to mine, although not identical in every respect, is Dunn's (*Romans*, 1.86, 98, 100, 106-7, 122-25).

28. Snodgrass ("To the Doers," 76) and Davies (*Faith and Obedience*, 80-104) question whether the primary purpose of this section is to show that all are sinners. But Moo (*Romans 1-8*, 87-218) convincingly shows that this is the main point of Rom 1:18-3:20.

29. The view that Paul addresses Gentiles in Rom 1:18-32 and Jews in 2:1-16 is found in most commentaries. For some representative examples see W. Sanday A. C. Headlam, *The Epistle to the Romans* (ICC; New York: Scribner's, 1910) 40-41, 54; Nygren, *Romans*, 101, 113-16; Kuss, *Römerbrief*, 1.30, 60-61; Wilckens, *Römer*, 1.93, 121; Murray, *Romans*, 1.35, 54-56; Käsemann, *Romans*, 33, 53-54; Cranfield, *Romans* 1.105-

That Paul is speaking exclusively of Gentiles in 1:18-32 is supported by the fact that he refers only to natural revelation in these verses (cf. Rom 1:19-21), and a condemnation of the Jews would probably refer also to their transgression of the Torah. In addition, homosexuality<sup>30</sup> and overt idolatry were not typical Jewish vices, and thus would be more fitting in describing the Gentile world.

That Paul is depicting the Gentile world in 1:18-32 receives support from the probability that in this text he draws on Jewish tradition which was typically used to condemn the Gentile world.<sup>31</sup>

Rom 2:1-5 most likely refers to the Jews because it is the Jews who would consider themselves morally superior due to possession of the law. They, as God's elect people, would reckon that God's kindness to them would make punishment unlikely (2:4).

2:17 explicitly mentions the "Jew" and the theme of vv. 17-29 is similar to 2:1-16, appearing in many respects to be a repetition of vv. 1-16. The doubling of this section suggests the Jews are in view in vv. 1-16 as well as in vv. 17-29.

#### *Romans 2:6-10*

Now that we have established that Romans 2 is directed to the Jews, we are prepared to look more carefully at the text itself. Rom 2:6 is a crucial text for our discussion since Paul says here that God "will repay each person according to his works." This verse must be investigated in its context if we are to understand precisely how it should be interpreted. It should be noted that v. 6 provides the ground or reason for Paul's assertion in v. 5 that the Jews are storing up wrath for themselves in the day of God's eschatological judgment. Wrath is being stored up *because* God judges each person according to works, and 2:1-4 make it plain that the works of the Jews are evil. There is an allusion here to Ps 62:12, and the importance of works is often

6, 138-39; Schlier, *Römerbrief*, 48, 68; Morris, *Romans*, 74, 107-8; Dunn, *Romans*, 1.78. Against the theory that Paul is speaking of Gentiles and Jews respectively see Leenhardt, *Romans* 59, 73-74; Barrett, *Romans*, 43; S. K. Stowers, *The Diatribe and Paul's Letter to the Romans* (SBLDS 57; Chico: Scholars Press, 1981) 112; L. Gaston, *Paul and the Torah* (Vancouver: University of British Columbia Press, 1987) 119-20; Bassler, *Divine Impartiality*, 121-23; Davies, *Faith and Obedience*, 47-52.

30. R. Scroggs (*The New Testament and Homosexuality: Contextual Background for Contemporary Debate* [Philadelphia: Fortress, 1983] 66-98) documents that in Jewish circles homosexuality was considered to be a Gentile vice. It should be noted, however, that Scroggs (110-11) still thinks that Rom 1:18-32 is directed to both Jews and Gentiles.

31. Cf., e.g., Wis 13-15; 2 Bar. 54:17-19; *T. Naph.* 3:3; *As. Mos.* 1:13.

found in Jewish literature.<sup>32</sup> We have already seen that judgment according to works in Paul is no surprise, for the importance of works is acknowledged elsewhere in his teaching.

Following on the heels of v. 5, v. 6 has a decidedly negative ring. There is certainly no indication in the text thus far that anyone will actually be justified on the last day by works. It should be noted, however, that vv. 7-10 further explain the proposition articulated in v. 6. In the chiasmic arrangement of vv. 7-10 there is an alternation between the negative and positive. Vv. 8-9 highlight the negative: Eschatological judgment awaits those who disobey the truth and practice evil. In support of the claim that Paul is speaking of eschatological judgment is the use of ὀργή in v. 8, which is linked with the same word in v. 5, and the latter passage clearly refers to eschatological judgment. Moreover, the antithesis to such punishment is the reception of "eternal life" (ἀιώνιος ζωή) in v. 7. Vv. 7-10 leave no doubt, then, that the repayment (ἀποδώσει) in view in v. 6 is an eschatological repayment, whether the repayment is eternal life or fiery wrath.<sup>33</sup>

The negative judgment of vv. 8-9 is in accord with judgment according to works, for those who are consumed by selfish ambition and disobey the truth will face wrath (v. 8). V. 9 complements v. 8: judgment will be meted *out to those who practice evil* (τοῦ κατεργαζομένου τὸ κακόν).

It needs to be stressed, however, that the eschatological repayment on the basis of works is not applied only to those who will experience wrath on the last day. Paul also speaks of "the one who does good" (τῷ ἐργαζομένῳ τὸ ἀγαθόν, v. 10), and that person will receive an eschatological reward of "glory, and honor and peace" (δόξα δε καὶ τιμὴ καὶ εἰρήνη). V. 7 describes such people as "seeking glory and honor and immortality by patient endurance in good work" (τοῖς μὲν καθ' ὑπομονὴν ἔργου ἀγαθοῦ δόξαν καὶ τιμὴν καὶ ἀφθαρσίαν ζητοῦσιν).<sup>34</sup> To them God will give "eternal life" (ζωὴν αἰώνιον). It seems fair to conclude that eternal life will be granted to those who persevere in doing good works. There is little doubt, then, that vv. 7-10 constitute a fuller explanation of the traditional statement cited

32. E.g., Job 34:11; Ps 28:4; Prov 24:12; Jer 17:10; 25:14; 32:19; 51:24; Ezek 33:20; 1QS 10:16-18; 1QH 18:12-13; 1QpHab 8:1-2; 4 Ezra 6:19; 7:17, 33-44; *Pss. Sol.* 2:17-18, 33-35; 9:4-5; 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; *T. Ben.* 10:7-9; *1 Enoch* 1:7-9; *As. Mos.* 12:10-11; *Sib. Or.* 4:183-85.

33. Actually the eschatological character of the repayment in v. 6 was already evident before reading vv. 7-10 since v. 6 provides the ground for v. 5, and the latter refers to eschatological judgment.

34. Moo (*Romans* 1-8, 135) rightly says that ἔργου ἀγαθοῦ is an objective genitive to ὑπομονήν.

in v. 6. And it should be noted that Paul does not focus only on the negative, but he also brings in the positive: *those who do good works* will receive an eschatological reward, namely, eternal life.<sup>35</sup>

As we have noted, some argue that the text is describing hypothetical obedience or that Paul is speaking rhetorically. But the burden of proof is on those who defend the hypothetical view since the presumption is that Paul affirms with Judaism and the Old Testament that good works are necessary for eternal life. Indeed, there is concrete evidence in Paul, as we have already noted, that good works are necessary in order to inherit the kingdom of God. It is possible that Paul will make it clear in the course of his argument that he is speaking hypothetically, but we shall argue shortly that Rom 2:26-29 instead proves that Paul genuinely affirms that some obey the law and thereby indicate that they will be saved from the day of wrath.

Paul is not merely speaking here of a possibility of reward for Gentiles, for what he says is true of both "Jew and Greek" (Rom 2:9-10). Thus, it is misleading to suggest that Romans 2 only speaks of Christian Gentiles who obey the law, although he emphasizes the latter in order to convict the Jews of their sin.

Yet to call these people *Christians* is to make a claim that is not found in the text itself. Are we smuggling it in from the outside?<sup>36</sup> If this objection can be sustained, then our interpretation is refuted. It is unreasonable to expect, however, what some interpreters seem to demand, namely, that the whole of what an author is saying would be communicated in five verses. Every interpreter without exception must consider the larger context in order to sustain a coherent interpretation, and what is learned from the wider context should be taken into account in formulating an interpretive hypothesis. The question is whether or not the particular appeal to the wider context is justifiable. My view is that the idea that Paul is speaking of Christians who do good works is defensible because in Rom 2:26-29 Paul makes it clear that those who obey the law have been transformed by the Holy Spirit. The latter verses are not from a distant context but are close at hand, illuminating the previous statements in the chapter on repayment according to works.

35. This text shows that the attempt to distinguish rigidly between ἔργα and ἔργων in Paul, the former being negative and the latter positive (so Mattern, *Das Verständnis Gerichtes*, 141-44; C. C. Crowther, "Works, Work and Good Works," *ExpTim* 81 [1969-1970] 169) cannot be sustained. The "works" in the plural which God recompenses (v. 6) can also be described in the singular in v. 7.

36. So Snodgrass, "To the Doers," 74-75. Watson (*Paul, Judaism and the Gentiles*, 118-19) complains that Cranfield can only see Christians in view by inserting "glosses" from Reformed theology.

*An Aside on Romans 2:14-15*

Before I turn specifically to Rom 2:14-15, a summary of how the entire structure of 2:6-12 is understood will help us establish the context. V. 6 is the thesis statement to the effect that God will repay each person according to works. Vv. 7-10 explain this thesis statement by means of a chiasmus, showing that those who do good (vv. 7, 10) will receive eternal life, while those who do evil will experience wrath and tribulation (vv. 8-9). V. 11 grounds all of vv. 6-10 (γάρ), explaining that God repays each person according to works (whether one is a Jew or Gentile) because he is impartial.<sup>37</sup> The "for" (γάρ) in v. 12 supports the assertion of God's impartiality in v. 11. What Paul is saying is this: Since God is impartial (v. 11), then it follows (v. 12) that all those who sin without the law (Gentiles) will perish without the law, and all those who sin with the law (Jews) will be judged by means of that law. God fairly judges each group according to the standard they possess. The rest of vv. 13-16 is related to v. 12 and will be explained below.

The reason the interpretation of Rom 2:14-15 is labeled as an aside is because it does not support (at least according to my interpretation) the idea that some believers will be justified by works. Nonetheless, these verses need to be investigated since some interpreters, as noted previously, contend that these verses demonstrate that unbelievers are under consideration throughout chapter 2. On the other hand, other scholars employ these same verses to say that Gentile Christians are in view throughout the chapter. I shall attempt to argue that neither of these conclusions is compelling. Contrary to the latter group of scholars, Gentile Christians are *not* being described in vv. 14-15. And contrary to the former, this does not prove that those being described in Rom 2:7, 10 and 26-29 are unbelievers.

I now proceed to examine vv. 12-16, although it should be said at the outset that there is no intention here to do a full exegesis of this text. I am only interested in investigating the question whether Paul is speaking of Gentile Christians in 2:14-15. I shall attempt to show that in 2:14-15 Paul is not speaking of Gentile Christians, but of nonbelieving Gentiles who occasionally observe the law, and this occasional obedience of the law is not sufficient for justification but will result in judgment.

V. 12 is a restatement of the assertion that each person will be judged by works (cf. v. 6). Gentiles who sin without the law will perish without the law, and Jews who sin under the law will be judged

37. On the importance of God's impartiality in Romans see Bassler, *Divine Impartiality*, 121-70.

on the basis of the law. The new feature introduced here is the law. Is the possession of the law any advantage to the Jew? Paul's answer is that the law is an advantage only if it is kept. He supports this statement (γάρ) in v. 13 (showing that his real concern from v. 12 is the situation of the Jew), saying that hearing the law does not make one righteous; it is the one who does the law who shall be justified (οἱ ποιητὰὶ νόμου δικαιοθήσονται). We shall argue later that Paul actually believes that one must obey the law in order to be justified. Even though Paul believes justification by works is possible (v. 13), it does not follow that the Gentiles being described in vv. 14-15 are Gentile Christians who are justified by their works. Indeed, there are good reasons for thinking that Paul is *not* thinking of Gentiles who are justified by their works in these verses.

Now some scholars, contrary to my view, think Gentile Christians are being described in vv. 14-15, understanding the γάρ in 2:14 to connect with 2:13b.<sup>38</sup> On this reading 2:13b says that those who do the law will be justified, and 2:14 introduces Gentiles who do the law (τὰ τοῦ νόμου ποιῶσιν) and are thereby justified. Such a connection between vv. 13-14 is attractive in many ways but not finally persuasive. It seems more probable that the connection between vv. 13-14 is found in connecting the main proposition of v. 14 to v. 13. The central proposition in v. 14 is in the independent clause which is paraphrased as follows: "These Gentiles, even though they do not have the Mosaic law, are a law to themselves." What Paul wants to prove here is that the Jews should not consider possessing the Mosaic law as a sign of salvation because even the Gentiles who do not have the Mosaic law have heard the law, and Jews do not consider Gentiles to be saved simply because the latter are aware of the moral norms contained in the law. The connection between vv. 13-14, then, is not that Gentiles do the law, and thus are justified. The connection is that the Gentiles, like the Jews, *have heard the law* in that it is written on their hearts, but such hearing of the law does not ensure justification.<sup>39</sup>

To put it another way: Paul does teach that one must do good works to be justified, but he does not bring up Gentiles in vv. 14-15 to defend that thesis. Rather, in vv. 14-15 he is attempting to show the Jews that the hearing of the law brings them no special favor in God's sight, for unbelieving Gentiles have also in a sense "heard" the requirements of the law without actually possessing it. Such hearing of the law is not a sufficient ground for justification.

38. So Mundle, "Auslegung von Rom 2, 13ff," 251; Cranfield, *Romans*, 1.155; König, "Gentile Christians?" 56.

39. For a similar understanding of the connection between vv. 13-14 see F. Godet, *Commentary on the Epistle to the Romans* (reprint, Grand Rapids: Zondervan, 1956) 123.

The interpretation I have proposed for the relationship between vv. 14-15 fits with the way I have explained the connection between Rom 2:12-13, for in these latter verses Paul's main point is that the Jewish possession of the law is of no advantage because it is not hearing but doing the law which justifies. Paul's main purpose in bringing up the Gentiles' knowledge of the law in vv. 12-16, then, is to show the Jews that the possession of the law is of no salvific advantage.

But one could argue further against the interpretation I have proposed as follows: Paul says in v. 14 that the law's witness among Gentiles is confirmed by their *doing* (ποιῶσιν) of the law, and such doing of the law is evidence that these Gentiles are Christians. Moreover, the fact that Paul appeals to "the work of the law written in their hearts" is an allusion to Jer 31:33 (38:33 LXX), confirming that these are Gentile Christians who are the recipients of new covenant blessing.<sup>40</sup>

Despite the strength of these arguments, there are two pieces of evidence which weigh against the Gentile Christian interpretation. First, Paul is probably not alluding to the new covenant promise of Jer 31:31-34. There Jeremiah speaks of the law being written on the heart, while here Paul speaks of the "work of the law" (τὸ ἔργον τοῦ νόμου) written on the heart. That this "work of the law" is not the same as the new covenant promise of having God's law on one's heart seems to be confirmed by v. 14, which says the Gentiles who do not have the law "are a law to themselves" (ἑαυτοῖς εἰσιν νόμος). To say that the Gentiles "are a law to themselves" would be an odd way of describing God's law written on the heart. But it fits nicely with the Greek conception of an unwritten law which is embedded on every person's heart.<sup>41</sup>

Second, v. 15b weighs against the Christian Gentile interpretation, for the work of the law in their hearts does not necessarily lead to salvation, but to accusing thoughts (τῶν λογισμῶν κατηγορούντων)

40. E.g., Cranfield, *Romans*, 1.158-59; König, "Gentile Christians?" 59-60; Souček, "Exegese von Röm 2, 14ff," 102-3; Mundle, "Auslegung von Röm 2, 13ff," 251.

41. So Kuhr, "Römer 2. 14f," 259-60; Bornkamm, "Gesetz und Natur," 104-7; Käsemann, *Romans*, 64; Dunn, *Romans*, 1.100. If this interpretation is accepted, then Paul describes here Gentiles who "do the law by nature" (φύσει τὰ τοῦ νόμου ποιῶσιν). In support of φύσει being linked with the verb ἔχοντα see Dunn, *Romans*, 1.98; Moo, *Romans 1-8*, 146, *contra* König ("Gentile Christians?" 58) and Cranfield (*Romans*, 1.156-57) who link φύσει to the participle ἔχοντα. If Paul is speaking of "doing the law by nature," as we have suggested, then it is quite improbable that he is referring to Gentile Christians. So Kuhr, "Römer 2. 14f," 255-56; Kuss, "Werke des Gesetzes," 90-91; Bornkamm, "Gesetz und Natur," 109, 111, *contra* Mundle, "Auslegung von Röm 2, 13ff," 252; Flückiger, "Werke des Gesetzes," 29-33; Souček, "Exegese von Röm 2, 14ff," 106-9.

on the day of judgment.<sup>42</sup> Such accusing thoughts indicate that the doing of the law described in vv. 14-15 is not a saving obedience, but an occasional obedience to the law. Such occasional obedience explains why at times their conscience<sup>43</sup> defends their actions, although it usually condemns them.<sup>44</sup>

I conclude, then, that Paul is not referring to Gentile Christians in Rom 2:14-15. Instead, he is describing non-Christian Gentiles who have written on their hearts the moral norms of the law. Occasionally they obey these moral norms, although usually they fail to keep the law, and thus their consciences will accuse them on the eschatological judgment day. It should be noted that Paul's main purpose in Rom 2:12-16 is to convince the Jews that possession of the law is of no salvific advantage. After all, Gentiles are also aware of the moral norms of the law and sometimes keep them, but that does not spare them from God's judgment. Obedience, not possession, of the law is necessary for justification.

#### *Romans 2:26-29*

A central text for our thesis is Rom 2:26-29, for we have said throughout that these verses prove that Paul is speaking of Gentile Christians in Rom 2:7, 10, 26-29. A brief summary of the line of thought and the context should be provided before I defend this interpretation. In 2:17-24 Paul argues that the Jewish possession of the law is worthless without obeying it. Proclamation of the law by the Jews without corresponding submission to it leads to the reviling of God's name among the Gentiles.

Paul anticipates in v. 25 another objection from his imaginary Jewish opponent. Not only is God's favor to the Jews displayed by the gift of the law, but also the elect status of the Jews is confirmed by circumcision. Thus, circumcision could be interpreted as a sign of protection from God's wrath.<sup>45</sup> Paul replies by arguing as he did regarding Jewish possession of the law in vv. 17-24. Circumcision only

42. Whether v. 16 is a gloss, and how it relates to v. 15 is also a matter of debate. We accept the verse as authentic and understand the present tense of κρίνει as signifying a future judgment which is in continuity with the present. For such a view see Dunn, *Romans*, 1.102-3; cf. Cranfield, *Romans*, 1.163-64; Käsemann, *Romans*, 66-68. Bornkamm ("Gesetz und Natur," 107) sees v. 16 as a gloss. For the contrary view see Walker, "Die Heiden und das Gericht," 313-14.

43. Literature on the conscience in Paul is enormous. For an older bibliography see Kuss, "Werke des Gesetzes," 91-92 n. 46; idem, *Römerbrief*, 1.76-82. For bibliographies which include more recent work see Dunn, *Romans*, 1.93-94; Schmithals, *Römerbrief*, 93.

44. So Godet, *Romans* 123; Dunn, *Romans*, 1.102; Moo, *Romans 1-8*, 149-50.

45. So Cranfield, *Romans*, 1.171; cf. Nygren, *Romans*, 132; Barrett, *Romans*, 58.

profits if one obeys the law. The Jew who does not obey the law has become uncircumcised in God's sight, i.e., he is no longer considered to be a member of the covenant.

Conversely (v. 26) the uncircumcised Gentile who obeys the law is considered by God to be circumcised, i.e., a member of the people of God. Moreover, (v. 27) the one who is physically uncircumcised and keeps the law will judge the Jew who despite the advantages of the law and circumcision transgresses the law.<sup>46</sup> The reason (γάρ in v. 28) circumcision and Jewishness do not avail before God is that God is not impressed with physical descent or outward signs. True Jewishness and circumcision are matters of the heart and are due to the work of the Spirit (v. 29). Those who are so transformed will be rewarded by God.

The evidence accumulates here to indicate that Paul has Gentile Christians in view in vv. 26-27.

First, the statement in v. 26 that the uncircumcised τὰ δικαιώματα τοῦ νόμου φυλάσσει is parallel to Rom 8:4 which refers to τὸ δικαίωμα τοῦ νόμου being fulfilled in believers who walk by the Spirit. The difference between the plural and singular of Static μα is not a material one;<sup>47</sup> both texts show that Paul describes believers as observing what the law enjoins.

Second, that Paul is thinking of believers is suggested by v. 26b where uncircumcised Gentiles are reckoned (λογισθήσεται<sup>48</sup>) to be circumcised if they obey the law. To be reckoned as circumcised means that such Gentiles are considered to be members of the covenant people since circumcision was the sign of the covenant between God and his people (cf. Gen 17:9-14). Moreover, λογίζομαι is used twelve times in Romans (3:28; 4:3, 4, 5, 6, 8, 9, 10, 11, 22, 23, 24; cf. Rom 9:8; Gal 3:6; 2 Cor 5:19) of those reckoned as righteous before God. Such "reckoning" refers to one's actual status before God in Romans 3-4. So too, there is no indication that such a reckoning is merely hypothetical in Rom 2:26. The straightforward reading of this text suggests that Paul is speaking of a matter which is real.

Third, v. 27 does not support the hypothetical interpretation, for once again Paul speaks realistically of Gentiles keeping the law (τὸν νόμον τελοῦσα).<sup>49</sup> The reference to Gentiles judging Jews does not

46. Διὰ in v. 27 denotes attendant circumstances. So *BDF* §223 (3); Sanday & Headlam, *Romans*, 67; Cranfield, *Romans*, 1.174; Käsemann, *Romans*, 74.

47. The focus in 8:4 is the unity of the diverse requirements of the law, while 2:26 emphasizes the diversity of the requirements. Cf. on this point Cranfield, *Romans*, 1.384.

48. This word is a divine passive here.

49. No significant distinctions should be drawn between the words πράσσειν (v. 25), φυλάσσειν (v. 26), and τέλειν (v. 27).

prove the hypothetical view, for it describes a real event in which Gentiles will function as a witness to the prosecution.<sup>50</sup>

Fourth, decisive for the Gentile Christian interpretation is the yap introducing vv. 28-29. The previous context has raised the question, how can Gentiles who obey the law be considered part of the people of God if they are not circumcised? Paul answers this implied question in vv. 28-29. True Jewishness and true circumcision are not outward matters. Instead, a Gentile who observes the law is considered a true Jew and circumcised (cf. v. 26) if he is a Jew inwardly and is circumcised in the heart. The presence of vv. 28-29 rules out any hypothetical interpretation of vv. 26-27, for now Paul explains how it is possible for Gentiles to be truly Jews and truly circumcised. The keeping of the law by the Gentiles is grounded in a work of God in which he has circumcised their hearts.

Paul has moved beyond only criticizing the Jews. He now defends the possibility of such obedience among the Gentiles. Of course, the main function of this section is still to convict the Jews of sin. The inclusion of Gentile Christians at this point in the argument does not represent a departure from the main theme of this section in the letter. Paul focuses on Gentile obedience so that the Jews would realize that they have no advantage before God. They too must believe in order to be saved. Indeed, Romans 2 is a foreshadowing of Romans 10-11 (cf. 10:19; 11.11, 14) where the inclusion of Gentiles is intended to provoke the Jews to jealousy so that they will repent. There is no legitimacy, then, in the complaint that a reference to Gentile Christians veers away from Paul's intention to show that no one can be saved by doing the law. Paul's main point in this section is rather that no one can be saved and observe the law without the Holy Spirit. Those who have the Spirit are empowered to observe the law (Rom 8:4), but one only receives the Spirit by believing in Jesus whom God has set forth as a propitiation for sin (Rom 3:21-26).

Fifth, the primary reason why we know that these Gentiles who observe the law in vv. 26-27 are Gentile Christians<sup>51</sup> is the phrase ἐν πνεύματι οὐ γράμματι (v. 29). Πνεῦμα is not a general reference to the spiritual reality of circumcision.<sup>52</sup> Paul is referring here rather to the Holy Spirit. Several lines of evidence converge to support such a view.

50. So Cranfield, *Romans*, 1.174.

51. For a strong disagreement with this interpretation see Schmithals, *Römerbrief*, 100-101. It should also be noted that vv. 28-29 would include Jewish Christians as well, for surely Paul believed that some Jews were circumcised in heart, although his emphasis from vv. 26-27 is to defend the inclusion of Gentiles into the people of God.

52. Contra M.-J. Lagrange, *Saint Paul Epître aux Romains* (Paris: Gabalda, 1950) 57; Barrett, *Romans*, 60; Althaus, *Römer*, 28.

The γράμμα – πνεῦμα antithesis elsewhere in Paul (Rom 7:6; 2 Cor 3:6) clearly involves a polarity between the letter and the Holy Spirit.<sup>53</sup> There is no indication that Paul has anything different in mind in this text. Indeed, all three texts share a common theme, for in each passage Paul shows that mere possession of law does not lead to obedience. In fact, the law alone kills and produces sin (2 Cor 3:6; Rom 7:5-6). True fulfillment of God's will only comes through the power of the Holy Spirit. Once again we see that Paul's point is not merely that no one can fulfill the law, but that those who do not have the Holy Spirit are unable to observe the law. The similar themes and wording in Romans 7, 2 Corinthians 3, and Romans 2 demonstrate that the polarity in each passage is between the law as a letter and the Holy Spirit.

Paul connects the genuineness of circumcision with the work of the Spirit in a parallel text in Phil 3:3. 1-11. Ἡμεῖς γὰρ ἔσμεν ἡ περιτομή, οἱ πνεύματι θεοῦ λατρεῦοντες. There is no doubt in Philippians 3 that he is thinking of the work of the Holy Spirit since he refers explicitly to the "Spirit of God" (πνεύματι θεοῦ). The remarkable similarity between Phil 3:3 and Rom 2:29 suggests that the Holy Spirit is in view in both passages.

The antecedents in Jewish literature to the circumcision of the heart suggest that the Holy Spirit is in view.<sup>54</sup> In particular, Deut 30:6 looks forward to a future day when God would circumcise the hearts of his people.<sup>55</sup> In Jeremiah the call to circumcise the heart is reiterated (Jer 4:4; cf. Deut 10:16).<sup>56</sup> The fulfillment of this command will only be possible when God writes his law on the heart in a new covenant (Jer 31:31-34).<sup>57</sup> Ezekiel says that obedience will only be possible when God takes out the heart of flesh and puts his Spirit in his people (Ezek 11:19-20; 36:26-27). *Jub.* 1:23 combines the themes

53. For a survey of interpretation and an independent contribution on the letter-spirit dichotomy in Paul see B. Schneider, "The Meaning of St. Paul's Antithesis: 'The Letter and the Spirit,'" *CBQ* 15 (1953) 163-207.

54. For a survey of such antecedents see S. Lyonnet, "La circoncision du coeur, celle qui relève de l'Esprit et non de la lettre (Rom 2:29)," *L'Evangile, hier et aujourd'hui* (Festschrift F. J. Leenhardt; ed. P. Bonnard; Genève: Labor et Fides, 1968) 89-94; E. Schweizer, "'Der Jude im Verborgenen, dessen Lob nicht von Menschen, sondern von Gott kommt' (Zu Röm 2, 28f und Mt 6, 1-18)," *Neues Testament und Kirche* (Festschrift R. Schnackenburg; ed. J. Gnllka; Freiburg: Herder, 1974) 118-19, 121-22.

55. Lev 26:41 also looks ahead to a day when God would restore his people if they will humble their uncircumcised hearts.

56. That Jeremiah's teaching on the circumcision of the heart has its roots in Deuteronomy is defended by M. Weinfeld, "Jeremiah and the Spiritual Metamorphosis of Israel," *ZAW* 88 (1976) 34.

57. Cf. J. A. Thompson, *The Book of Jeremiah* (NICOT; Grand Rapids: Eerdmans, 1980) 216; Weinfeld, "Jeremiah," 34; H. S. Gehman, "An Insight and Realization: A Study of the New Covenant," *Int* 9 (1955) 284.

of Jeremiah and Ezekiel, linking circumcision of the heart with the gift of the Holy Spirit. "But after this they shall return to me in all uprightness and with all of their heart and soul. And I shall cut off the foreskin of their heart and the foreskin of the heart of their descendants. And I shall create for them a holy spirit, and I shall purify them so that they will not turn away from following me and to all my commandments."<sup>58</sup> It is notable that the author of *Jubilees* is citing Moses who expects such a work of the Spirit in the future. Paul, like, or in dependence upon, the author of *Jubilees* also saw the OT passages of a circumcised heart as having an eschatological fulfillment, but he saw these promises fulfilled in the gift of the Spirit to the new community.<sup>59</sup>

The parallels in Paul elsewhere and the Jewish antecedents to Rom 2:29 make it clear that Paul is speaking of the work of the Spirit here. There are several implications which follow from this emphasis on the work of the Holy Spirit.

Since Paul is speaking of the new covenant work of the Spirit, he is thinking of genuine obedience, not hypothetical obedience here. The new covenant promise involves obedience to God's law (cf. Jer 31:31-34; Ezek 36:26-27), not by human strength but by the renewing and transforming power of the Holy Spirit.

The Jewish antecedents we noted above point to a new age when the Spirit will come and hearts will be circumcised with the result that God is obeyed. According to Paul, this gift of the Spirit is a gift of the new age, and thus it is quite probable that Paul is thinking specifically of Gentile Christians who obey the law in vv. 26-27. There may have been a few Gentiles in Paul's view who obeyed the law in the old era, but the emphasis in his thinking is that the old age is one in which people were dominated by sin.

It should be emphasized that the obedience described in Rom 2:26-27 is rooted in and dependent upon the work of the Spirit who has circumcised the heart (Rom 2:28-29). The relationship between vv. 26-27 and vv. 28-29 (in which vv. 28-29 ground vv. 26-27) clearly implies that the Spirit's work on the heart *logically precedes* the keeping of the law by the Gentiles. There is no idea here of earning or meriting salvation by keeping the law. The observance of the law is a sign of the work of the Spirit, the fruit of his power in one's life (cf. Gal 5:22-23). Such a conception harmonizes with Jer 31:31-34 and

58. Translation of O. S. Wintermute in *The Old Testament Pseudepigrapha* (Vol. 2; ed. J. H. Charlesworth; Garden City: Doubleday, 1985).

59. For the idea that Paul had in mind the inbreaking of the new age in Rom 2:28-29 see Käsemann, *Romans*, 74; O. Cullmann, *Salvation in History* (New York: Harper & Row, 1967) 261; H. N. Ridderbos, *Paul: An Outline of His Theology* (Grand Rapids: Eerdmans, 1975) 334-35.

Ezek 36:26-27, for in these texts as well the work of God on the heart logically precedes the keeping of the law. Rom 2:29 also says that those who are true Jews and have experienced a circumcised heart will receive praise from God.<sup>60</sup> The praise (ἔπαινος) in view here is an eschatological reward from God (cf. 1 Cor 4:5; 1 Pet 1:7).<sup>61</sup> The reward described in v. 29 should not be understood as a reward subsequent to and in addition to eternal life. That the reward is eternal life itself is suggested by v. 26, for there the uncircumcised person who keeps the law "is reckoned" as circumcised. We have already pointed out that to be reckoned as circumcised is equivalent to being part of the covenant people. It is the same as being saved. Vv. 28-29 suggest the same thought: Those who keep the law demonstrate that they are true Jews and truly circumcised, that is, that they truly belong to the people of God. The praise which comes from God (v. 29), therefore, is the acknowledgment by God on the last day that they were his people. Those who were true Jews and the true circumcision may be hidden from the eyes of many until the last day, but then God will unveil those who are truly his own.

The connection of v. 29 with what Paul said in Rom 2:6-10 should also be highlighted. In vv. 26-29 he says that those who keep the law have received a circumcision of the heart which is the work of the Spirit. And it is those who keep the law who will receive an eschatological reward (ἔπαινος) on the day of judgment. The promise of eschatological reward for those who have obeyed the law is also found in vv. 6-10, for there Paul says that those who do good works will receive eternal life. The reception of eternal life in vv. 6-10 is another way of describing the eschatological reward that God's people will receive in v. 29.

Rom 2:6-10 speaks of doing good works to obtain eternal life, Rom 2:26-29 speaks of keeping the law to obtain an eschatological reward and be a member of the covenant people, and Rom 2:13 says that those who keep the law will be justified. We conclude that those who observe the law are doing good works, and that such good works are necessary for justification and eternal life.

### CONCLUSION: OBJECTIONS AND RESPONSES

A possible objection to the overall interpretation suggested thus far is that it is too complicated: Christians are in view in 2:7, 10 and

60. It is probable that ἔπαινος introduces a play on words here since there is a connection between "Judah" (יהודה) and "praise" (הודיה) in Hebrew. So Cranfield, *Romans*, 1.175; Dunn, *Romans*, 1.123. Against this view see Käsemann, *Romans*, 77.

61. So Cranfield, *Romans*, 1.175-76; Käsemann, *Romans*, 77; Wilckens, *Römer*, 1.158.

2:26-29, but unbelieving Gentiles who will be condemned are described in 2:14-15. Such shifting back and forth, it might be claimed, shows either that my exegesis or Paul's thought is tortuous. But my reply to this possible objection is that the main thesis of Romans 2, which is that the Jews will only escape judgment if they keep the law, is sustained throughout. Moreover, there is consistency in that Paul argues that both Jews and Gentiles who do not possess the Spirit are unable to keep the law, while Gentiles who have been transformed by the Spirit are empowered to observe the law. The three sections we have examined in this article advance this same thesis in different ways. 2:6-11 stresses God's impartiality in judging according to works. In accord with the typical Jewish view Paul believes that some will be rewarded with good works, and sinners who do evil will be judged. Here Paul uses the theme of God's impartiality in judgment to counter any claim of Jewish privilege. *Any person* who perseveres in doing good will receive eternal life, where as all who do evil, whether Jew or Gentile, will experience eschatological wrath. In 2:12-16 he addresses a possible objection from the Jews. Does not the possession of the Mosaic law show that God is partial, that he favors the Jews? Paul argues that merely having the law is of no advantage. What counts is obeying it. Even unbelieving Gentiles are conscious of moral norms, which they occasionally obey, but such occasional obedience by Gentiles will not spare them from eschatological judgment. Neither will Jews who fail to keep the law escape God's wrath. Lastly, the imaginary objector in vv. 25-29 says that at least circumcision is a sign of special favor. But once again Paul replies that such a sign is of no value apart from obedience to the law. Indeed, the OT rite of circumcision finds its true significance in the circumcision of the heart which Gentile Christians experience through the work of the Holy Spirit. By stressing the inclusion of the Gentiles and the failure of the Jews to obey the law Paul is hinting that the Jews will never be able to do the law as long as they are separate from the Christian community. The work of the Spirit among the Gentiles will, Paul hopes, provoke the Jews to jealousy (Rom 10:19; 11:11, 14) with the result that they will embrace his gospel. To sum up: Paul answers possible Jewish objections in different ways, and in the course of his argument shows that works are necessary for salvation, and that evil will be punished.

Finally, we must deal with the question of whether Paul's insistence that people are justified by works contradicts his statement in Rom 3:20 that no one can be justified by doing the works of the law. At first blush there is a contradiction here, but it seems improbable to me that Paul would embrace justification by works in one chapter, and then deny precisely what he just advocated in the next. It is

likely that Paul is addressing two different situations in Romans 2 and 3:20, and that his view of the Mosaic law played a major role on this question. When he says that no one can be justified by "works of law," he addresses those who think they can enter the new community by their obedience to the law, that is, those who think they can earn their salvation by good works. To such he says that perfect obedience is necessary to enter the kingdom. And since, according to Paul, perfect obedience is impossible ("through the law is knowledge of sin" [Rom 3:20]), it is a great illusion for sinners to think that they can put God in their debt by doing good works.<sup>62</sup>

The emphasis on the circumcision of the heart by the power of the Holy Spirit in Rom 2:29 is, as we have seen, a confirmation of this idea. Paul does not believe that Gentiles can obey the law sufficiently to be saved either. Before the law can be obeyed by anyone, Jew or Gentile, the Holy Spirit must enter one's heart. It is also clear in Pauline theology, however, that no one receives the Spirit by doing what the law demands (cf. Gal 3:1-5). The Spirit is received by faith, and is *the mark* that one belongs to the Christian church (Rom 8:9). Now if the Spirit is received by faith *before* the law is obeyed, and if the presence of the Spirit is the sign that one is a believer, then it follows that no one *enters* into the Christian church on the basis of good works. The Spirit is given freely and graciously to all those who put their faith in Jesus Christ. No one can be righteous before God by the works of the law, because no one can obey the law perfectly (Gal 3:10). My point is that Rom 2:29 clearly implies that the Spirit was given before the law was obeyed, and thus even in Romans 2 there is no conception of entering the kingdom or earning salvation by obeying the law.

On the other hand, even though Paul insists that no one can attain salvation by good works, he also insists that no one can be saved without them, and that they are necessary to obtain an eschatological inheritance. The Spirit's work in a person produces obedience to the law (Rom 2:26-29). The saving work of Jesus Christ radically changes people so that they can now obey the law which they previously disobeyed (cf. Rom 8:1-4). The works that are necessary for salvation, therefore, *do not constitute an earning of salvation but are evidence of a salvation already given*. The gift of righteousness which is given freely to believers is necessarily accompanied by the transforming work of the Spirit,<sup>63</sup> for ultimately the gift of the Spirit can-

62. For a defense of this interpretation on "works of law" see my "'Works of Law' in Paul," *NovT* 33 (1991) 217-44.

63. So P. Stuhlmacher, *Gerechtigkeit Gottes bei Paulus* (FRLANT 87; 2d ed.; Göttingen: Vandenhoeck & Ruprecht, 1966) 228-31. Stuhlmacher rightly rejects the theory of double justification, which seems to suggest two different ways of salvation. For such

not be separated from the justifying work of God.<sup>64</sup> Such good works manifest the work of the Holy Spirit in the believers' life. We should also stress that Paul is not speaking of perfect obedience, but of obedience that is significant, substantial, and observable. Even though the Spirit is given, there is still a "not yet" in his theology. The day of full redemption is still in the future (Rom 8:10, 23). Thus, there is some ambiguity in the Christian communities. Some who appear to be believers will be shown not to have received the saving gift of righteousness. They will fail to pass the test on the last day, for their works will be lacking. Such a failure will prove that they were never truly part of the new community.<sup>65</sup>

a theory see Godet, *Romans*, 118; J. Jeremias, "Paul and James," *ExpTim* 66 (1954-55) 370. We are not necessarily saying that righteousness in Paul is a transformative gift. Our point is that even if righteousness in Paul is only forensic, salvation in Paul consists of more than this.

64. So S. K. Williams, "Justification and the Spirit in Galatians," *JSNT* 29 (1987) 90-100.

65. For such a view see the recent study by Gundry Volf, *Paul and Perseverance*.