

## THE NEW PERSPECTIVE AND “WORKS OF THE LAW” (GAL 2:16 AND ROM 3:20)

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*The New Perspective on Paul (NPP) differs from a traditional understanding of Paul’s references to the “works of the law.” Traditionally, Paul’s references to such works has been seen in a negative light, but the NPP takes a very opposite view of the works. Pre-NT references to works of the law show that they cannot be limited to circumcision, Sabbath-keeping, and dietary restrictions the way NPP advocates propose. Broadly considered, NT references to the same works show the same impossibility. Two crucial passages, Gal 2:16 and Rom 3:20, when analyzed in detail, indicate the grave error in the NPP position. Three occurrences of “works of the law” in Gal 3:20 show that they are the direct opposite of faith in matters pertaining to salvation. The context of Rom 3:20 shows that “works of the law” refer to human deeds to earn merit with God and are not limited to circumcision, Sabbath-keeping, and dietary restrictions. Rather, they simply demonstrate how guilty human beings are before a righteous God. Salvation is by faith alone in Christ alone and not by the “works of the law.”*

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A landslide of writings from the viewpoint of the New Perspective on Paul (NPP) are like boulders and debris that have littered the road leading to an accurate understanding of salvation. However, in spite of the massive amount of literature aimed at destroying two millennia of clarity regarding the relationships of works, righteousness, faith, and salvation, the road is yet passable and the obstructions avoidable. NPP proponents have failed to block the way completely. Granted, some adherents of the NPP never intended such damage, but they nonetheless have contributed to the current dilemma within evangelicalism. A crux in the debate over the NPP involves Paul’s use of the phrase “works of the law,” especially in Gal 2:16 and Rom 3:20. The discussion below will focus on these verses.

### **Introduction to the Problem**

Two basic questions are at the heart of this issue: What does Paul mean by “the works of the law”? And, what is the NT believer’s relationship to “the works of

the law”? Traditionally, the church has held that Paul spoke negatively of the Judaizers’<sup>1</sup> use of the law. Throughout church history theologians have identified the Judaizers with a legalistic<sup>2</sup> approach to salvation. Thus, the phrase “works of the law” refers to those works believed to be necessary for salvation. According to the adherents of the NPP, however, the traditional view smacks of anti-Semitism<sup>3</sup> and reflects a forced exegesis that they believe exemplified the Western Reformation. Since a major thesis of the NPP is that salvation in first-century Judaism was not based on works,<sup>4</sup> NPP proponents often define “works of the law” as those works that mark the people of the covenant, identifying them ethnically and socially. Specifically, those works are circumcision, Sabbath-keeping, and dietary restrictions. Obviously, both positions (traditional and NPP) cannot be correct. The two are diametrically opposed and contain very different theological corollaries.

### Pre-NT References to “Works of the Law”

In order to understand the NT phrase “works of the law” best, the exegete must first examine its usage in Judaism, especially in the OT and the intertestamental period. OT texts like Lev 18:3-4 speak of “works,” but do not qualify the term with the phrase “of the law.” However, as Ringgren points out, the contextual reference and contrast are significant: “When *ma’āśeh* refers to deeds or actions, the reference is occasionally to conduct as such and its manner. For example, Israel is warned not to do as the Egyptians and Canaanites do and follow their *huqqôṭ* (Lev. 18:3).”<sup>5</sup> Therefore, such works have a connotation of being in accord with certain standards, customs (*huqqôṭ*), and regulations, be they social or legal. In some contexts the phrase “do/perform the law” (עָשָׂה הַתּוֹרָה, *‘āsāh hattôrâh*) refers to specific regulations. For example, in Num 6:21 the phrase is employed with reference to the Nazirite regulations. Thus, the Nazirite performs a work of the law in keeping his vows.

In passages like Deut 28:58 (cf. 29:29 [Heb 29:28]; 31:12; 32:46), Josh 1:7 (cf. 22:5; 23:6) and Neh 9:34 (cf. 2 Chr 14:3; 33:8), “do/perform the law” has reference to the entire law, not to one particular ordinance. These same passages call for the implementation of covenant curses for disobedience to the law. By context these texts do not refer to ethnic or social markers identifying Israel. Instead, they refer to the entire Mosaic legislation including every facet of that law. The point is

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<sup>1</sup>The term is drawn from Gal 2:14 (πῶς τὰ ἔθνη ἀνακάλυψαι ἰουδαίσει, “how can you force the Gentiles to live like Jews?”), the only NT use of the verb.

<sup>2</sup>“Legalism is both the attempt to earn righteousness by obedience to the Law, and it is human pride in the accomplished obedience” (J. V. Fesko, “N. T. Wright and the Works of the Law,” *Faith & Mission* 22/1 [Fall 2004]:69).

<sup>3</sup>James D. G. Dunn claims that the traditional view feeds “an evil strain of Christian anti-Semitism” in his essay “The New Perspective on Paul,” in *The Romans Debate*, rev. ed., ed. Karl P. Donfried (Peabody, Mass.: Hendrickson, 1991) 300.

<sup>4</sup>See Stephen Westerholm, *Israel’s Law and the Church’s Faith: Paul and His Recent Interpreters* (Eugene, Ore.: Wipf and Stock, 1998) 143.

<sup>5</sup>H. Ringgren, “עָשָׂה,” in *Theological Dictionary of the Old Testament*, ed. G. Johannes Botterweck, Helmer Ringgren, and Heinz-Josef Fabry, trans. David E. Green (Grand Rapids: Eerdmans, 2001) 11:400.

that such references to works of the law are virtually identical with Paul’s use of “works of the law” in both Galatians and Romans (further support will be offered in later sections of this article).

In the intertestamental period, sectarian authors at Qumran spoke of the members of their community as “doers/workers of the law” (*’ōšē hattōrāh*, 1QpHab 7:11; 8:1; 12:4).<sup>6</sup> They did not indicate that “the law” in such cases was limited to circumcision, Sabbath-keeping, or dietary regulations. Joseph A. Fitzmyer, one of the world’s leading authorities on Qumran, Aramaic, and the intertestamental period, concludes that Qumran materials (especially 4QMMT 3.29) rule out “the suggestion of both Dunn, about a restricted sense of *erga nomou*, . . . , and Gaston, that the gen. *nomou* is a subjective gen[itive].”<sup>7</sup> Fitzmyer goes on to declare that

The Qumran usage makes it clear that “deeds of the law” refers, indeed, to things prescribed or required by the Mosaic law. To the extent that a “works righteousness” would be indicated by the phrase in question, this reading reveals that Paul knew whereof he was speaking when he took issue with contemporary Judaism and its attitude to legal regulations. In 4QMMT the phrase is used precisely in a context mentioning *šdqh*, “uprightness,” and employs the very words of Gen 15:6 that Paul quotes about Abraham in 4:2c.<sup>8</sup>

He is clearly at odds with the NPP’s limitation of the works to circumcision, Sabbath-keeping, and dietary regulations in a context dealing with righteousness or justification. As will be demonstrated, the NT depicts first-century Judaism as continuing to employ “works of the law” and similar phraseology with the same broad reference as the OT and the Qumran texts.

#### NT References to “Works of the Law”

Paul uses νόμος (*nomos*) approximately 74 times in Romans and 32 times in Galatians—more than all the rest of his letters combined (14 times). “Works of the law” (ἔργα νόμου, *erga nomou*) is a phrase occurring 8 times in Paul’s epistles to the Galatians (2:16 *tris*; 3:2, 5, 10) and Romans (3:20, 28). Similar expressions appear elsewhere:

Gal 2:21, *ei j ga; r dia; novmou dikaiosuvnh (ei gar dia nomou dikaiosynē)*, “for if righteousness comes through law”

Gal 3:11, *ejn novmw/ oujdei; " dikaiou'tai (En nomō oudeis dikaioutai)*, “by the law no one is made righteous”

Rom 2:15, *to; e[rgon tou' novmou grapto;n ejn tai'" kardivai" aujtw'n (to ergon tou nomou grapton en tais kardiais*

<sup>6</sup>Ibid., 11:402.

<sup>7</sup>Joseph A. Fitzmyer, *Romans: A New Translation with Introduction and Commentary*, AB (New York: Doubleday, 1993) 338.

<sup>8</sup>Ibid., 338-39. In addition to 4QMMT 3.29, references such as 4QFlor 1.7, 1QS 5.21, 6.18, 1QpHab 7.11, 8.1, 12.4-5, and 11QTemple 56.3-4 demonstrate that the phraseology indicates the entirety of the law. See Thomas R. Schreiner, *Romans*, Baker Exegetical Commentary on the NT (Grand Rapids: Baker, 2004) 173, on this point.

*autōn*), “the work of the law written on their hearts”

Rom 3:21, *cwri;* " *novmou dikaiosuvnh qeou' pefanevrwtai (chōris nomou dikaiosynē theou pephanerōtai)*, “without the law the righteousness of God has been manifested”

Rom 3:27, *dia;* *poiyou novmou... tw'n e[rgwn... (dia poiou nomou? tōn ergōn?)*, “through what kind of law? of works?”

Rom 4:2, *eij ga;r jAbraam ejx e[rgwn ejdikaiwvqh (ei gar Abraam ex ergōn edikaiōthē)*, “for if Abraham was justified by works”

Eph 2:9, *oujk ejx e[rgwn (ouk ex ergōn)*, “not by works.”

A look at “the works of the law” and “law” in Rom 3:20-21 shows that the two are interchangeable. The passage contains no hint that the meaning should be limited to specific statutes in the law.<sup>9</sup> All of the references occur within contexts dealing with justification or righteousness with regard to salvation rather than sanctification. A careful examination of the first of the cruxes, Gal 2:16, will demonstrate that it also deals with salvation.

#### **Galatians 2:16**<sup>10</sup>

Placing the verse within its greater context helps to give a clearer view of Paul’s intended meaning. According to Richard Longenecker and Robert Rapa, a consistent first-century Greek rhetorical analysis of Galatians results in the following schema:

- I. Salutation (1:1-5)
- II. Rebuke Section, including autobiographical details and theological arguments (1:6–4:11)—forensic rhetoric prominent
  - A. Occasion for Writing/Issues at Stake—*Exordium*<sup>11</sup> (1:6-10)
  - B. Autobiographical Statements in Defense—*Narratio*<sup>12</sup> (1:11–2:14)
  - C. The Proposition of Galatians—*Propositio*<sup>13</sup> (2:15-21)
  - D. Arguments in Support—*Probatio*<sup>14</sup> (3:1–4:11)
- III. Request Section, including personal, scriptural, and ethical appeals (4:12–6:10)—deliberative rhetoric prominent (*Exhortatio*)

<sup>9</sup>See Westerholm, *Israel's Law and the Church's Faith* 118.

<sup>10</sup>*eijdvte" de; o{ti ouj dikaiou'tai a[nqrwpo" ejx e[rgwn novmou eja;n mh; dia; pivstew" jIhsou' Cristou', kai; hJmei'" eij" Cristou;n jIhsou'n ejpisteuvsamen, i{na dikaiwqw'men ejk pivstew" Cristou' kai; oujk ejx e[rgwn novmou, o{ti ejx e[rgwn novmou ouj dikaiwqhvsetai pa'sa savrx.* All citations of the Greek NT are from *Novum Testamentum Graece*, Nestle-Aland 27th ed. (Stuttgart: Deutsch Bibelgesellschaft, 1993).

<sup>11</sup>*Exordium* = An introduction establishing the identity and credentials of the speaker.

<sup>12</sup>*Narratio* = The statement of the case the writer is making.

<sup>13</sup>*Propositio* = Points of agreement and disagreement.

<sup>14</sup>*Probatio* = Development of the defense.

IV. Subscription (6:11-18).<sup>15</sup>

This analysis indicates that all of the occurrences of “works of the law” in Galatians occur in the “Rebuke Section.” That suggests that the meaning in Galatians possesses specific negative overtones. Taking into consideration Paul’s negative understanding of the character of his opposition (the Judaizers), one sees clearly that the distinction is not purely ethnic or sociological.<sup>16</sup> Consider the following characteristics of Paul’s opposition:<sup>17</sup>

- They preach a different (ἕτερος, *heteros*) gospel (1:6).
- They are “disturbing” Paul’s converts and “distorting” his gospel message (1:7).
- They demand circumcision of Gentiles (2:3; 5:2-3; 6:12-13).
- They are “false brethren” (ψευδαδελφοί, *pseudadelphoi*) seeking bondage rather than freedom (2:4; 5:1).
- They belonged to the “party of the circumcision” (τοὺς ἐκ περιτομῆς, *tous ek peritomēs*, 2:12).
- They compel Gentile Christians to live like Jews (τα; ε[qnh ajnagkavzei" ijoudai?zein, *ta ethnē anagkazeis ioudaizein*, 2:14).
- They accuse Paul’s Christ of promoting sin (αJmartiva" diavkono", *hamartias diakonos*, 2:17).
- They cause the Galatian believers to be spellbound and drawn away from the gospel (3:1).
- The Gentiles must accept their ethic in order to be saved (4:17, “they wish to shut you out so that you will seek them”).

Paul’s antagonists were not simply first-century Jews with a grace perspective practicing so-called “covenantal nomism”<sup>18</sup> nor were they “‘right wing’ Jewish Christians.”<sup>19</sup> Clearly, they were first-century enemies of the faith and opponents of the gospel in particular. It is not an issue of admitting the Gentiles into the faith,<sup>20</sup> but of the Judaizers themselves not being in the faith.

E. P. Sanders’ opinion that “the quality and character of Judaism is not in view”<sup>21</sup> is inconsistent with what we know from Scripture itself. Jesus describes the Jews of His day as “hypocrites” (Matt 23:13, 14, 15, 23, 25, 27, 29) who do not

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<sup>15</sup>Richard N. Longenecker, *Galatians*, WBC (Waco, Tex.: Word, 1990) cvii-cviii. See detailed discussion of the rhetorical data in Robert Keith Rapa, *The Meaning of “Works of the Law,”* in *Galatians and Romans*, Studies in Biblical Literature 31 (New York: Peter Lang, 2001) 101-22.

<sup>16</sup>Rapa, *The Meaning of “Works of the Law”* 108.

<sup>17</sup>See a full listing in *ibid.*, 83-84, 89-91.

<sup>18</sup>Covenantal nomism is a term coined by E. P. Sanders. He defines it as “The view that one’s place in God’s plan is established on the basis of the covenant and that the covenant requires as the proper response of man his obedience to its commandments, while providing means of atonement for transgression” (E. P. Sanders, *Paul and Palestinian Judaism* [Minneapolis: Fortress, 1977] 75).

<sup>19</sup>E. P. Sanders, *Paul, the Law, and the Jewish People* (Minneapolis: Fortress, 1983) 18.

<sup>20</sup>As proposed by *ibid.*, 19.

<sup>21</sup>*Ibid.*

“enter” (note the choice of terms used by the Savior—the issue is one of entrance into rather than maintenance within<sup>22</sup>) the kingdom of heaven nor do they “allow those who are entering to go in” (v. 13).<sup>23</sup> Their proselytes are “twice as much a son of hell” as they (v. 15). Their condemnation comes upon them because they “have neglected the weightier provisions of the law: justice and mercy and faithfulness” (v. 23). Jesus does not refer to such things as circumcision, Sabbath-keeping, and dietary laws. The first-century Jews were so perverse and rebellious against God that they partook of and exceeded the sins of their ancestors by murdering God’s prophets (vv. 30-37). Christ sums up His evaluation of the spiritual condition of first-century Judaism by the rhetorical question, “How shall you escape the sentence of hell?” (v. 33). Sanders’ picture of first-century Judaism contradicts that of Jesus. That factor alone should destroy permanently the foundational premises supporting the NPP.

If Sanders’ view of first-century Judaism is correct, one might expect that he would find widespread agreement from adherents to Judaism. How do Jewish scholars look at Sanders’ view? One of the world’s leading Jewish experts on Judaism, Jacob Neusner, describes Sanders as a writer with a “rich capacity to make up distinctions and definitions as he goes along, then to impose these distinctions and definitions upon sources that, on the face of it, scarcely sustain them.”<sup>24</sup> According to Neusner, the Gospels

claim that, with the coming of the Messiah, the Temple had ceased to enjoy its former importance, and those who had had charge of Israel’s life—chief among them the priests, scribes, and Pharisees—were shown through their disbelief to have ignored the hour of their salvation. Their unbelief is explained in part by the Pharisee’s hypocrisy and self-seeking.<sup>25</sup>

What is Neusner’s bottom line regarding Sanders’ attempt to redefine first-century Judaism? According to Neusner, the Judaism which has Sanders’ approval “turns out to be a Judaism in the model of Christianity (in Sanders’s pattern). So if Sanders’s Pharisees result from a mere tinkering with some details of mine, his ‘Judaism’ represented as *kosher* to Liberal Protestantism is only a caricature and an offence. With friends like Sanders, Judaism needs no enemies.”<sup>26</sup>

Though Sanders believes that Paul rejected covenantal nomism, James D. G. Dunn interprets Paul’s position as in agreement with it. Dunn believes that “works of the law” refers to “badges” of membership in the covenant people. In other words,

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<sup>22</sup>Contra Wright: “The Jew keeps the law out of gratitude, as the proper response to grace—not, in other words, in order to *get* into the covenant people, but to *stay* in” (N. T. Wright, *What Saint Paul Really Said: Was Paul of Tarsus the Real Founder of Christianity?* [Grand Rapids: Eerdmans, 1997] 19).

<sup>23</sup>All English Bible citations occurring without a reference to the Greek are from NASB Updated (1995). When Greek is given together with an English translation, the translation is this author’s.

<sup>24</sup>Jacob Neusner, “Mr. Sanders’ Pharisees and Mine: A Response to E. P. Sanders,” *Jewish Law from Jesus to the Mishnah*, *Scottish Journal of Theology* 44 (1991):74.

<sup>25</sup>*Ibid.*, 76.

<sup>26</sup>*Ibid.*, 75.

deeds that mark out “the Jews as God’s people; given by God for precisely that reason, they serve to demonstrate covenant status.”<sup>27</sup> He proposes that Paul replaced these identity markers or badges (circumcision, Sabbath-keeping, and dietary regulations) with faith in Christ.<sup>28</sup>

The conjunction *δέ* (*de*, “but,” Gal 2:16) presents a contrast with the immediate context (v. 15, “We *are* Jews by nature and not sinners from among the Gentiles”). According to John Eadie, this indicates “a transition from a trust in Judaism, so natural to a born Jew.”<sup>29</sup> Paul declares that he is by nature a Jew and not a sinner among the Gentiles. Furthermore, Eadie observes that Paul’s reference to “sinners” is “a designation of all who were beyond the limits of theocracy.”<sup>30</sup> In other words, Paul is saying, “Though we are Jews by descent, and not Gentiles who as such are regarded by us from our elevation as sinners, yet our Judaism, with all its boasted superiority, could not bring us justification.”<sup>31</sup> “Sinners” is almost a synonym for “Gentiles” (ἔθνη, *ethnē*) in the religious phraseology of the Jews (cf. 1 Macc 2:44).<sup>32</sup> In the Gospels Luke uses “sinners” (6:32-33) similar to Matthew’s use of “Gentiles” (5:47) and Matthew uses “sinners” (26:45) similar to Luke’s use “Gentiles” (18:32). It is safe therefore, to see the same equivalency employed by Paul in Gal 2:15.

“Knowing” (εἰδότες, *eidotes*, Gal 2:16) is a causal participle standing in antithesis to “*though* we are Jews by nature” in order to provide the reason for “we have believed in Christ Jesus.”<sup>33</sup> Paul is describing his conversion and that of believers in the Galatian church. What was the content of that knowledge that brought them to Christ? Paul says that it was that “a man is not justified by the works of the law.” By “a man” (ἄνθρωπος, *anthrōpos*) Paul indicates a generic, non-ethnic reference. The truth embodied in the knowledge that brought him and the Galatians to Christ applied equally to Jew and Gentile. Hogg and Vine took this as another indication of the nature of Paul’s opposition, observing that “the Judaizers had too readily forgotten that a common humanity underlies all merely national

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<sup>27</sup>James D. G. Dunn, “Works of the Law and the Curse of the Law (Galatians 3,10-14),” *New Testament Studies* 31 (1985):528. This is also the view of N. T. Wright, *The New Testament and the People of God*, Christian Origins and the Questions of God 1 (Minneapolis: Fortress, 1992) 237-38.

<sup>28</sup>James D. G. Dunn, *Jesus, Paul, and the Law: Studies in Mark and Galatians* (Louisville, Ky.: Westminster John Knox, 1990) 196.

<sup>29</sup>John Eadie, *Commentary on the Epistle of Paul to the Galatians* (Edinburgh: T & T Clark, 1884; reprint, Minneapolis: James and Klock, 1977) 163.

<sup>30</sup>*Ibid.*, 162.

<sup>31</sup>*Ibid.*

<sup>32</sup>“They organized an army, and struck down sinners in their anger and lawless men in their wrath; the survivors fled to the Gentiles for safety” (Herbert G. May and Bruce M. Metzger, eds., *The New Oxford Annotated Bible with the Apocrypha: Revised Standard Version* [New York: Oxford University Press, 1977]).

<sup>33</sup>Ernest de Witt Burton, *A Critical and Exegetical Commentary on the Epistle to the Galatians*, ICC (reprint of 1921 ed., Edinburgh: T. & T. Clark, 1971) 119.

distinctions.”<sup>34</sup> In other words, Jew and Gentile alike need justification, because all alike are sinners estranged from a righteous God.

Commenting on this same element of universality and the tendency for people to trust in a merit system of works, Moisés Silva, in a recent publication of essays taking the NPP to task, says,

It is no less ill-advised, however, to deduce that first-century Judaism was free from the universal human tendency to rely on one's own resources rather than on God's power. Why should it be thought that ethnic pride and (personal) self-confidence are mutually exclusive factors? The attempt to work for, or at least contribute to, one's own salvation by means of good deeds was hardly absent in the Jewish communities with which Paul interacted (cf. Sir 3:30 NRSV, “As water extinguishes a blazing fire, so almsgiving atones for sin [ἐλεημοσύνη ἐξιλάσεται ἁμαρτίας]).” And if a modern Jewish writer can openly admit that he grew up worrying that his good deeds would not outweigh his sins, why should it be difficult to believe that people in the first century could experience similar fears?<sup>35</sup>

In an earlier review of one of Dunn's volumes, Silva also wrote that legalism

belongs to the heart of sin in its universality; indeed, legalism is but the human cry for personal autonomy. Doing things our way as distinct from trusting God's power. . . . The inclination toward self-righteousness is thus *not* a unique Jewish problem: it is endemic to the human condition.<sup>36</sup>

Paul writes that a man “is not justified” (οὐ δικαιοῦται, *ou dikaiontai*). What is the meaning of “justified”? Does its sense confirm the view that salvation is involved? In his commentary on Romans, Charles Hodge explains that “justified” is “a forensic term; that is, it expresses the act of a judge . . . a judicial act.”<sup>37</sup> The Greek verb (both here and in a second form later in the verse) is passive, a theological passive: God is the understood agent of justification. Indeed, as John MacArthur writes, this forensic term refers to “the free and gracious act by which God declares a sinner right with Himself.”<sup>38</sup> This is consistent with the context of Paul's statement. Galatians 2:16 refers to salvation for sinners, not the sanctification of believers. As Hodge warned, justification should never be confused with

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<sup>34</sup>C. F. Hogg and W. E. Vine, *The Epistle to the Galatians* (Fincastle, Va.: Scripture Truth Book Co., 1921) 87.

<sup>35</sup>Moisés Silva, “Faith versus Works of Law in Galatians,” in *Justification and Variegated Nomism, Volume 2: The Paradoxes of Paul*, eds. D. A. Carson, Peter T. O'Brien, and Mark Seifrid (Grand Rapids: Baker, 2004) 246-47.

<sup>36</sup>Moisés Silva, “The Law and Christianity: Dunn's New Synthesis,” *Westminster Theological Journal* 53/2 (Fall 1991):349.

<sup>37</sup>Charles Hodge, *Commentary on the Epistle to the Romans* (reprint of 1886 rev. ed., Grand Rapids: Eerdmans, 1972) 82.

<sup>38</sup>John MacArthur, *Galatians*, MacArthur New Testament Commentary (Chicago: Moody, 1987) 56.



sanctification, since it “is always used in the sense antithetical to condemnation.”<sup>39</sup>

Contrary to traditional exegesis and theological understanding, Dunn’s interpretation of “justified” is that Paul was “not thinking of a distinctively *initiatory* act of God. God’s justification is not his act in first *making* covenant with Israel, or in initially accepting someone into the covenant people. God’s justification is rather God’s acknowledgement that someone is in the covenant.”<sup>40</sup> Wright takes a similar stance when he explains, “It is not ‘how you become a Christian,’ so much as ‘how you can tell who is a member of the covenant family.’”<sup>41</sup>

In an apparently mediating viewpoint, Rapa concludes that Paul intends “*both* the relational forensic category of acquittal for sins *and* the consequent ethical ‘right’ behavior pattern of God’s people.”<sup>42</sup> At first reading this might appear to be applying two meanings to a single occurrence of the term (“justification” or “justify”), but Rapa’s point is that the behavioral sense of justification rises out of the forensic sense. In addition, he concludes that the Judaizers must have believed the law to be salvific. He suggests that the Judaizers were in accord with “mainstream Judaism of Paul’s day.”<sup>43</sup> He seems to contradict this conclusion when he writes that “it is an injustice to the greater Judaism of Paul’s day to attribute indiscriminately the attitude of one part to the whole.”<sup>44</sup> To which part did the Galatian Judaizers belong? In response Rapa indicates that Paul’s Judaizers were perhaps Pharisees and represented one faction outside of what might be termed as “normative” Judaism.<sup>45</sup> In other words, legalistic segments or groups existed within first-century Judaism.

It is just this kind of Jew (legalistic) with whom Paul deals. Once again, the view of the NPP is contradicted by the exegetical data. Why does the NPP have such a difficult time understanding this? Perhaps it is because adherents to the NPP too often equate OT biblical theology with the actual beliefs and practice of first-century Jews. What the OT teaches is one thing; what first-century Jews actually expressed and performed was something quite different. If their theology and life were consistent with the OT, why was it necessary for God to reject them and send them into exile again? Were there those Jews in the first-century who preserved correct, biblical theology? Of course. But, were they a majority? Absolutely not.

Justification, according to Paul, is not obtained “by works of the law” (ἐξ ἔργων νόμου, *ex ergōn nomou*). F. F. Bruce declares that the phrase refers to “the actions prescribed by the law” that indicate “a spirit of legalism” that believes that

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<sup>39</sup>Hodge, *Romans*, 82. “To justify, then, is not merely to pardon and restore to favour; nor is it to make inwardly just or holy, but it is to declare or pronounce just; that is, judicially to declare that the demands of justice are satisfied, or that there is no just ground for condemnation” (*ibid.*, 84).

<sup>40</sup>Dunn, *Jesus, Paul, and the Law* 190.

<sup>41</sup>N. T. Wright, *What Saint Paul Really Said* 122.

<sup>42</sup>Rapa, *The Meaning of “Works of the Law”* 134 (emphasis in the original).

<sup>43</sup>*Ibid.*, 167.

<sup>44</sup>*Ibid.*, 173 n. 18.

<sup>45</sup>*Ibid.*, 176 n. 37.

such works “will win acceptance before God.”<sup>46</sup> Bruce’s assessment is in agreement with that of Ernest de Witt Burton, who concludes that “law” is employed here “in its legalistic sense, denoting divine law viewed as a purely legalistic system made up of statutes, on the basis of obedience or disobedience to which men are approved or condemned as a matter of debt without grace. This is divine law as the legalist defined it.”<sup>47</sup> It is also clear, as Ronald Fung points out, that the reference is to the law in its entirety.<sup>48</sup>

Paul repeatedly and emphatically speaks of the contrast between “works of the law” and faith. In Gal 3:2 he asks the Galatians, “Did you receive the Spirit by the works of the law, or by hearing with faith?” This is salvific language, the language of entrance into salvation. In Gal 3:10 Paul cites Deut 27:26 to prove that the works of the law bring only a curse. More specifically, every single individual (παῖς ὅς, *pas hos*, is not national<sup>49</sup> language) who fails to keep “all things written in the book of the Law” is under a curse.<sup>50</sup> In Phil 3:9 the apostle prays that he “may be found in Him, not having a righteousness of my own derived from *the* law, but that which is through faith in Christ, the righteousness which *comes* from God on the basis of faith.” Paul does not speak of maintenance or sanctification, but of salvation. The language of sanctification employs “found by Him” (cp. 2 Pet 3:14, ἀὐτῷ εὐρεθῆναι, *autō heurethēnai*); the language of salvation employs “found in Him” (εὐρεθῶ ἐν αὐτῷ, *heurethō en autō*) in Phil 3:9.

If these observations are insufficient to convince the reader, Titus 3:5 is food for thought: “He *saved* us, not on the basis of deeds which we have done in righteousness, but according to His mercy, *by the washing of regeneration and renewing by the Holy Spirit*” (*emphasis added to mark the salvific content*). “Deeds done in righteousness” is a legitimate equivalent for “the works of the law.” Verse 7 ties the passage to the concept of justification as well as re-emphasizing salvation by Paul’s reference to “eternal life.”

Back to Gal 2:16. Paul continues with the words, “but through faith in Jesus Christ” (ἐὰν μὴ διὰ πίστεως Ἰησοῦ Χριστοῦ, *ean mē dia pisteōs Iēsou Christou*). F. F. Bruce comments that Dunn’s treatment of *ean mē* as introducing an

<sup>46</sup>F. F. Bruce, *The Epistle to the Galatians: A Commentary on the Greek Text*, NIGTC (Grand Rapids: Eerdmans, 1982) 137.

<sup>47</sup>Burton, *Galatians* 120.

<sup>48</sup>Ronald Y. K. Fung, *The Epistle to the Galatians*, NICNT (Grand Rapids: Eerdmans, 1988) 114.

<sup>49</sup>Contra N. T. Wright, *Climax of the Covenant: Christ and the Law in Pauline Theology* (Minneapolis: Fortress, 1993) 146. See, also, the individual emphasis even in Deut 27:15 (אַרְרַר הָאִישׁ, *ārūr hā’iš*), “cursed is the man.”

<sup>50</sup>Sanders proposes that the force of Gal 3:10 rests with the words “law” and “cursed” and that the word “all” just “happens to appear” (Sanders, *Paul, the Law, and the Jewish People* 21). It is partially on this point that he concludes: “The argument seems to be clearly wrong that Paul, in Galatians 3, holds the view that *since* the law cannot be entirely fulfilled, *therefore* righteousness is by faith” (*ibid.*, 22-23). Cp. A. Andrew Das, *Paul, the Law, and the Covenant* (Peabody, Mass.: Hendrickson, 2001) 153, for the individual focus of Deuteronomy 27–30.

exception clause (“except through faith”) runs “counter to Greek idiom.”<sup>51</sup> As Silva observes, “this was Bruce’s gentle way of stating that such a translation was an unbearable solecism.”<sup>52</sup> The apostle’s phraseology contains a clear antithesis between works and faith—in the traditional view, faith that has as its object Jesus Christ.<sup>53</sup>

Emphatic “we” (ἡμεῖς, *hēmeis*) resumes the focus begun in v. 15. The emphatic pronoun lays stress on the fact that the apostle and the Galatian believers chose the path of being justified by faith rather than by works of the law.<sup>54</sup> The plural pronoun associates the apostle with even “the lowly members of the church in Galatia.”<sup>55</sup>

The concluding portion of the verse offers a citation from the OT as the basis for such a choice: “for by works of the law no flesh will be justified” (ὅτι ἐξ ἔργων νόμου οὐ δικαιοθήσεται πᾶσα σὰρξ, *hoti ex ergōn nomou ou dikaiōthēsetai pasa sarx*).<sup>56</sup> It appears to be a free citation of or verbal allusion to Ps 143:2.<sup>57</sup> Evidence for such a free citation is as follows:

- (1) Addition: Paul added *ex ergōn nomou* (“by works of the law”) in order to give “the general expression of the psalmist a particular application.”<sup>58</sup>
- (2) Omission: The apostle omitted the prepositional phrase ἐνώπιόν σου (*enōpion sou*, “before you”) since it might be assumed by the reader anyway. Note its inclusion in Rom 3:20 where Paul cites the same verse, echoing the psalmist’s confession of his inability to vindicate himself.<sup>59</sup>
- (3) Alteration: Paul substituted *pasa sarx* (“all flesh”) for πᾶς ζῶν (*pas zōn*, “all living”), employing the more familiar Hebraism. “All flesh” suits his argument well since it has overtones of rebellion and disobedience (Gen

<sup>51</sup>F. F. Bruce, “Paul and the Law in Recent Research,” in *Law and Religion: Essays on the Place of the Law in Israel and Early Christianity*, ed. Bamabas Lindars (Cambridge, England: James Clarke, 1988) 115-25, esp. 125.

<sup>52</sup>Silva, “The Law and Christianity” 346.

<sup>53</sup>The debate over whether the genitive (“of Jesus Christ”) is subjective or objective still rages unabated. Good men are on both sides of the question. It remains to be seen if anyone can demonstrate that the type of genitival usage really has any bearing on the meaning of “the works of the law” in the context. Even if one concludes that it is Christ’s own faith (subjective genitive) here, that does not alter clear declarations like Gal 3:26 and Eph 2:8-9. For a brief introduction to the debate over the genitive, see Bruce W. Longenecker, “Defining the Faithful Character of the Covenant Community: Galatians 2:15-21 and Beyond: A Response to Jan Lambrecht,” in *Paul and the Mosaic Law*, ed. James D. G. Dunn (Grand Rapids: Eerdmans, 2001) 79-82, together with the attendant footnotes.

<sup>54</sup>Fung, *Galatians* 117.

<sup>55</sup>Leon Morris, *Galatians: Paul’s Charter of Christian Freedom* (Downers Grove, Ill.: InterVarsity, 1996) 86.

<sup>56</sup>J. B. Lightfoot in *The Epistle of St. Paul to the Galatians* (Grand Rapids: Zondervan, 1971), 115, indicates that the citation contains an obvious Hebraism in πᾶσα σὰρξ.

<sup>57</sup>MT: חַיִּיךָ לְפָנַי וְלִפְנֵי כָל אֲשֶׁר יִשְׁמְרֶנִּי וְלִפְנֵי כָל אֲשֶׁר יִשְׁמְרֶנִּי וְלִפְנֵי כָל אֲשֶׁר יִשְׁמְרֶנִּי וְלִפְנֵי כָל אֲשֶׁר יִשְׁמְרֶנִּי; LXX [142:2]: ὅτι οὐ δικαιοθήσεται ἐνώπιόν σου πᾶς ζῶν.

<sup>58</sup>Fung, *Galatians* 118.

<sup>59</sup>Fitzmyer, *Romans* 337.

6:12) as well as possibly countering “the Judaizers’ claim that circumcised flesh was accepted as righteous before God.”<sup>60</sup>

In the Greek “justified” (*dikaiōthēsetai*) is a future indicative passive verb. As a theological passive<sup>61</sup> it indicates that God is the agent of the action. Its future tense, as Silva notes, does more than refer generally to individual justification in the present. It has an eschatological implication as well. The context of Ps 143:2 does not refer directly to an eschatological situation, but the pericope at Rom 3:19-20 implies it. Indeed, the concept “is grounded in that final judgment, so that our sense of assurance (cf. Gal. 4:6-7) is not a psychological strategy that by-passes reality, but rather a proleptic manifestation of God’s righteous verdict.”<sup>62</sup> Likewise, as Silva later adds, “It is precisely because we enjoy God’s righteousness at the present time that we can with confidence await (*ἀπεκδεχόμεθα*, *apekdechometha*, Gal 5:5) the final and definitive verdict.”<sup>63</sup> It would violate the texts in both Gal 2:16 and Rom 3:19-20 to ignore either the immediate or the future aspects of justification.

In regard to the phrase “no flesh,” Wright argues that it demonstrates that Paul speaks of the imposition of covenant curses (viz., Deuteronomy 27–28) on the disobedient nation of Israel so that it appeared that the nation’s role in bringing blessing to the Gentiles would never be fulfilled. In other words, because the nation was under the curse of the law, it seemed that justification could not come to “all flesh.”<sup>64</sup> Translating the clause as “no flesh shall be justified,” Wallace takes the Greek to mean that “Paul did view the law as impossible to obey (contra Sanders) and as something brought in precisely to cause the nation to reflect on the total inadequacy of a works-righteousness.”<sup>65</sup>

“By works of the law” (*ex ergōn nomou*) occurs three times in Gal 2:16. The occurrences are progressive: (1) General (“a man is not justified by the works of the law”), (2) personal (“we may be justified by faith in Christ and not by the works of the law”), and (3) universal (“by the works of the law no flesh will be justified”).<sup>66</sup>

### **Romans 3:20**<sup>67</sup>

Much of what has been concluded in regard to Gal 2:16 applies equally to

<sup>60</sup>Fung, *Galatians* 118.

<sup>61</sup>Daniel B. Wallace, “Galatians 3:19-20: A Crux Interpretum for Paul’s View of the Law,” *Westminster Theological Journal* 52/2 (Fall 1990): 235 n. 60: “Paul does seem to be fond of what we might call the “theological passive” elsewhere (e.g., 1 Cor 12:13); for other NT writers, see M. Zerwick, *Biblical Greek Illustrated by Examples* (Rome: Scripta Pontificii Instituti Biblici, 1963) 76 (§236).

<sup>62</sup>Moisés Silva, *Explorations in Exegetical Method: Galatians as a Test Case* (Grand Rapids: Baker, 1996) 174.

<sup>63</sup>*Ibid.*, 182.

<sup>64</sup>Wright, *The Climax of the Covenant* 155.

<sup>65</sup>Wallace, “Galatians 3:19-20” 245.

<sup>66</sup>MacArthur, *Galatians* 57.

<sup>67</sup>*diōvti ejx e[rgwn novmou ouj dikaiwqhvsetai pa'sa sa;rx ejnwpion auj'tou', dia; ga;r novmou ejpivgnwsi" aJmartiva".*

this passage, so repetition is unnecessary. As for the context of Rom 3:20, Wallace makes a valuable observation concerning a major difference between the two epistles: “Romans is a refinement and articulation of the seminal thought of Galatians, but is not in conflict with Galatians.”<sup>68</sup> Silva reaches basically the same conclusion stating that the evidence “suggests strongly that Romans consists of a systematic answer to the objections raised . . . by the Judaizers. What Galatians sets forth with great urgency in the heat of battle, the letter to the Romans develops more calmly and fully during a lull in the midst of Paul’s stormy ministry.”<sup>69</sup> The reader can expect, then, a more complete treatment of the meaning of the law and “the works of the law” in Romans. Fitzmyer rightly concludes that Rom 3:10-20 wraps up the apostle’s negative development of the thesis he proposed back near the start of the epistle in 1:16-17.<sup>70</sup> Paul spends the intervening chapters developing the concepts of both righteousness and law. From the start he speaks of salvation vs. condemnation. The focus in 1:16–3:19 is not on either sanctification or identification. To read the text as speaking of anything but salvation is to break it from its contextual moorings and set it adrift at the mercy of the winds of NPP doctrines.

In the immediate context (vv. 10-18), Paul cites OT passages as proof that Jews are only hearers, not doers of the law.<sup>71</sup> Verse 19 is the logical summary of and conclusion to the OT citations.<sup>72</sup> They are taken mostly from Psalms (one text is from Isaiah).<sup>73</sup> All of them speak of obedience to the law. Paul cites the testimony of Scripture to prove that “all human beings, Jews and Greeks alike, are enslaved to sin.”<sup>74</sup> The first occurrence of “law” (v. 19) cannot be limited dogmatically to the law of Moses. After all, none of the citations are from the Pentateuch. Schreiner issues a caution, however: “Nonetheless, a definite distinction should not be made since those who are branded as wicked in the Psalms and Isaiah are evil precisely because they did not observe the law of Moses.”<sup>75</sup> It would be safe to conclude, though, that the references in Psalms and Isaiah do not limit the law to its regulations on circumcision, Sabbath-keeping, and dietary restrictions. Thus, Paul’s citations are not supportive of NPP adherents who insist on arguing that the apostle was only referring to the markers for Jewish identity or covenant relationship.

Within the flow of the epistle to the Romans it is clear that OT texts “that distinguished between the righteous and wicked are now turned against Jews who believed they were righteous, in order to prosecute the theme that all are guilty

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<sup>68</sup>Wallace, “Galatians 3:19-20” 245.

<sup>69</sup>Silva, *Explorations in Exegetical Method* 155.

<sup>70</sup>Fitzmyer, *Romans* 334. Schreiner likewise interprets the function of vv. 19-20 “as the conclusion to all of 1:18–3:20” (Schreiner, *Romans* 168).

<sup>71</sup>William G. T. Shedd, *Commentary on Romans* (n.p.: Charles Scribner’s Sons, 1879; reprint, Grand Rapids: Baker, 1980) 68.

<sup>72</sup>Ibid., 70.

<sup>73</sup>Vv. 10-12 (Pss 14:1-3 [LXX 13:1-3]; 53:1-3 [LXX 52:1-3]); v. 13 (Ps 5:9 [MT and LXX 5:10]); v. 14 (Ps 10:7 [LXX 9:28]); vv. 15-17 (Isa 59:7-8); v. 18 (Ps 36:1 [MT 36:2, LXX 35:2]).

<sup>74</sup>Fitzmyer, *Romans* 333.

<sup>75</sup>Schreiner, *Romans* 168.

before God. By abolishing the distinction between the righteous and the wicked, Paul overturns the Jewish concept of covenantal protection.<sup>76</sup> Even Sanders agrees that the topic is salvation in Romans: “[I]t is clear [in Romans 1–4] that one of Paul’s major concerns is to assert that salvation is for both Jews and Gentiles and that it must be *based on the same ground*.”<sup>77</sup> Once more, one can only conclude that the primary theme is salvific in nature.

Verse 20 presents the reason for v. 19’s declaration that everyone must stand silent before God when faced with evidence from the law indicating their guilt.<sup>78</sup> Martin Luther, writing on Rom 3:27-28, presents the traditional understanding of the phrase: “What the apostle means by works of the law are works in which the persons who do them trust as if they are justified by doing them, and thus are righteous on account of their works.”<sup>79</sup> By “deeds prescribed by the law” Paul “means thereby that no one will attain the status of uprightness before God’s tribunal by performing deeds mandated by the Mosaic law, or by ‘all that the law says’ (3:19).”<sup>80</sup> In other words, good works are not the primary meaning. Obedience to the law of Moses is the primary focus. Since there is no such thing as perfect obedience, there is no way anyone can earn a way into God’s presence or merit His forgiveness for his/her sins. As in Gal 2:16, the apostle has chosen to employ Ps 143:2 in order to express the universality of sin.

The final clause in 3:20, “for through the law is the knowledge of sin” (διὰ γὰρ νόμου ἐπίγνωσις ἁμαρτίας, *dia gar nomou epignōsis hamartias*) explains that the purpose of the law is to provide knowledge of sin, not justification. Nor is its purpose to sanctify, but to reveal sin’s presence.<sup>81</sup> To be consistent, NPP proponents who limit the works of the law to the badges of membership in the covenant community would have to read the verse as follows: “For by circumcision, kosher food laws, and the Sabbath, no human being will be identified as a member of the covenant, since through the covenant badges comes knowledge of sin.”<sup>82</sup> Nowhere does Paul make such a limitation. Instead, he demonstrates that the knowledge of sin comes through commandments like the tenth one in the Ten Commandments (Rom 7:7). In fact, as the context (1:16–3:19) has already demonstrated, the entire law is in view. Are Sabbath-keeping, circumcision, and dietary laws the sole basis for obedience in 2:13? Are Sabbath-keeping, circumcision, and dietary regulations the law written on the heart in v. 15? Is stealing a fourth “badge” in v. 21 or adultery in v. 22? If circumcision is negated by breaking the law, how can circumcision be the statute that was broken (v. 25)? Can “whatever the law

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<sup>76</sup>Ibid., 167.

<sup>77</sup>Sanders, *Paul and Palestinian Judaism* 488 (cf. 515-16, emphasis in the original).

<sup>78</sup>Shedd, *Romans* 71; Hodge, *Romans* 81.

<sup>79</sup>Martin Luther, *Lectures on Romans*, trans. and ed. Wilhelm Pauck, Library of Christian Classics 15 (Philadelphia: Westminster, 1961) 119.

<sup>80</sup>Fitzmyer, *Romans* 337.

<sup>81</sup>Schreiner, *Romans* 169.

<sup>82</sup>Fesko, “N. T. Wright and the Works of the Law” 74.

says” (3:19) be limited to the three markers of the covenant?<sup>83</sup> There is no room for such an artificial restriction. Yet that is exactly what the NPP does.<sup>84</sup>

Even though Dunn now supposedly recognizes that “works of the law” cannot be limited to circumcision and food laws,<sup>85</sup> Schreiner cautions on reading too much into Dunn’s apparent reversal, because Dunn “simply thinks that the focus is on works that distinguish Jews from Gentiles, but this admission is not integrated appropriately in his exegesis.”<sup>86</sup>

### Conclusion and Application<sup>87</sup>

For the meaning of “works of the law” biblical testimony is more authoritative than the declarations of theologians, whether they are from the early church, the Reformation, or the 20th or 21st centuries. The testimony of the OT, Jesus, and Paul is contrary to the viewpoint of the NPP. Part of the confusion created by NPP is due to the fact that its adherents too often misidentify the spirituality of first-century Judaism with that required in the OT. If the Jews in the first century had exhibited the spirituality demanded by the OT, they would not have rejected the Messiah and they would not have been judged by exile and dispersion.

The NPP premise that the law can sanctify is also misleading. As Luther observed in his comments on Rom 3:20, “Indeed, neither the good works that precede justification nor those that follow from it make a man righteous—how much less the works of the law!”<sup>88</sup> Indeed, “works of the law” can neither save nor sanctify (cf. 6:12-14). For the believer, faith produces good works, not the reverse (cf. Eph 2:8-10).<sup>89</sup>

For those who might believe that the NPP provides an option to what they perceive as an antinomianism in the traditional interpretation of both “works of the

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<sup>83</sup>Schreiner, *Romans* 173. As an additional argument, Schreiner comments that “the linkage between 3:27-28 and 4:1-8 suggests that there is not even a focus on ‘identity markers,’ but that ‘works of law’ is a general designation for all the works commanded in the Mosaic law, so that ‘works of law’ refers to the actions or deeds required by the Mosaic law” (ibid.).

<sup>84</sup>See further, Fitzmyer, *Romans* 338.

<sup>85</sup>James D. G. Dunn, “Yet Once More—‘The Works of the Law’: A Response,” *Journal for the Study of the New Testament* 46 (June 1992):102.

<sup>86</sup>Schreiner, *Romans*, 173 n. 19.

<sup>87</sup>This is a fitting point to recommend to the reader an excellent treatment of the NPP: Guy Prentiss Waters, *Justification and the New Perspectives on Paul: A Review and Response* (Phillipsburg, N.J.: Presbyterian and Reformed, 2004). He is extremely helpful in his treatment of the views of N. T. Wright, who has become the pied piper leading young evangelicals off into dangerous theological territory. Especially helpful is Waters’ discussion of Wright’s view on baptism (145-46), which is consistent with sacramental baptismal regeneration. Wright’s clearest statements on baptism are to be found in his “Romans,” in *New Interpreter’s Bible*, ed. Leander E. Keck (Nashville, Tenn.: Abingdon, 2002) 10:533-35. Why would an evangelical want to base his soteriology on the teachings of someone who is soteriologically challenged? It is fascinating that so many adherents to the NPP are either theologians or pastors in denominations identified with baptismal regeneration.

<sup>88</sup>Luther, *Lectures on Romans* 108.

<sup>89</sup>Again, it was Luther who wrote with regard to Rom 3:19-20, “[J]ustification does not need the works of the law, but it needs a living faith that produces its own works” (ibid., 102).

law” and “justification by faith,” Jesus Himself made it abundantly clear that freedom from the law does not mean freedom from the demands of righteous living. Six times in the Sermon on the Mount Jesus said “you have heard” (Matt 5:21, 27, 31, 33, 38, 43) before citing an element of the law. Six times Jesus proceeded to add, “but I say to you” (vv. 22, 28, 32, 34, 39, 44) as he expressed an even higher standard that He demands of those who follow Him. In fact, He said, “unless your righteousness exceeds *the righteousness* of the scribes and Pharisees, you will by no means enter the kingdom of heaven” (v. 20). Such high standards make salvation even more difficult, if it comes by works. No better commentary can be offered on Gal 2:16 and Rom 3:20. The apostle merely filled out the teachings of Christ by repeatedly specifying that salvation is by faith alone in Christ alone and not by the “works of the law.”