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Psalm 143.2 and the Argument of Galatians 3.10

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Abstract

In the ongoing discussions of Gal 3.10–14, interpreters have underappreciated the connection between Paul's argument in 3.10 and his use of Ps 143.2 in 2.16. This article argues that Paul bases his denial of justification by works in 2.16 on the confession of humanity's universal sinfulness in Ps 143.2. Given the rhetorical function of 2.15–21 as well as the close verbal and logical ties between 2.16 and 3.10, it contends the same thought underlies Paul's charge in 3.10 that those of works are under a curse. On this basis, the article assesses various interpretations of Gal 3.10.

Keywords: Galatians; psalm; curse; law; works; Paul

Introduction

Much attention has been given in recent years to Gal 3.10 in the context of discussions of Paul's theology of the Mosaic Law. The long-standing interpretation of this verse treats Paul's argument as a syllogism with a suppressed minor premise. Paul begins with the conclusion: 'As many as are of the works of the law are under a curse.'¹ The citation of Deut 27.26 provides the major premise: 'Cursed is everyone who does not remain in all the things written in the book of the law, to do them.' The implied minor premise is that no one is able to do the law sufficiently.²

Though still perhaps the majority position,³ this understanding of Paul's logic – especially the implied premise – has been increasingly challenged. It is frequently objected that a

¹ Unless otherwise noted, all Scripture translations are the author's.

² This view has an ancient and distinguished pedigree, including Justin Martyr, *Dial.* 95; John Chrysostom, *Hom. Gal.* on 3.10; Thomas Aquinas, *Commentary on Saint Paul's Epistle to the Galatians* (trans. F. R. Larcher; Aquinas Scripture Series 1; Albany, NY: Magi, 1966) 80; M. Luther, *Lectures on Galatians, 1535, Chapters 1–4* (Luther's Works 26; Saint Louis, MI: Concordia, 1963) 254; J. Calvin, *Commentaries on the Epistles of Paul to the Galatians and Ephesians* (trans. W. Pringle; Edinburgh: Calvin Translation Society, 1854) 89. Modern advocates include H. Lietzmann, *An die Galater* (HNT 10; Tübingen: Mohr (Paul Siebeck), 1932³) 19; J. B. Lightfoot, *Epistle of St. Paul to the Galatians* (Grand Rapids: Zondervan, 1957) 137; A. Oepke, *Der Brief des Paulus an die Galater* (THKNT 9; Grand Rapids: Evangelische Verlagsanstalt, 1964³) 72; T. R. Schreiner, 'Is Perfect Obedience to the Law Possible? A Re-Examination of Galatians 3:10', *JETS* 27 (1984) 159–60; A. A. Das, *Paul, the Law, and the Covenant* (Grand Rapids, MI: Baker Academic, 2001) 145–70; S. Kim, *Paul and the New Perspective: Second Thoughts on the Origin of Paul's Gospel* (Grand Rapids: Eerdmans, 2002) 141; S. Westerholm, *Perspectives Old and New on Paul: The 'Lutheran' Paul and his Critics* (Grand Rapids: Eerdmans, 2004) 375 n. 66; D. J. Moo, *Galatians* (BECNT; Grand Rapids: Baker Academic, 2013) 202–3; C. S. Keener, *Galatians: A Commentary* (Grand Rapids: Baker Academic, 2019) 235.

³ As estimated by Keener, *Galatians*, 235.

premise of the law's unfulfillability ignores the law's provision for sin in the sacrificial system⁴ and Paul's own positive assessment of his righteousness in the law (Phil 3.6).⁵ Some interpreters also argue that the implied premise of the traditional view is irrelevant: even if the law could be kept, it would not give life.⁶ Others charge proponents with failing to provide positive evidence for this view, either taking its reasonability for granted or maintaining it simply through the criticism of other interpretations.⁷ Likewise, passages commonly appealed to as evidence, i.e. Gal 5.3 and 6.13,⁸ are dismissed as not providing genuine support.⁹ On the basis of these criticisms, numerous alternatives have been proposed.

My aim in this study is to highlight a consideration for the interpretation of Gal 3.10 that has often been underappreciated, if not wholly neglected, in discussions of this text: the relationship between Paul's reasoning in Gal 3.10 and his use of Ps 143.2 in Gal 2.16.¹⁰ I argue that Paul's use of Ps 143.2 in Gal 2.16 is especially salient for determining the assumption underlying his argument in Gal 3.10. I also contend that the relationship between these

⁴ D. P. Fuller, 'Paul and "the Works of the Law"', *WTJ* 38 (1975) 28–42, at 34–5; E. P. Sanders, *Paul, the Law, and the Jewish People* (Philadelphia: Fortress, 1983) 29; N. T. Wright, *The Climax of the Covenant: Christ and the Law in Pauline Theology* (Minneapolis: Fortress, 1992) 145; J. D. G. Dunn, *The Epistle to the Galatians* (BNTC; Peabody, MA: Hendrickson, 1993) 171; N. H. Young, 'Who's Cursed – and Why? (Galatians 3:10–14)', *JBL* 117 (1998) 28–42, at 83; T. G. Gombis, 'The "Transgressor" and the "Curse of the Law": The Logic of Paul's Argument in Galatians 2–3', *NTS* 53 (2007) 81–93, at 83; J. N. Aletti, 'L'argumentation de Ga 3,10–14, une fois encore. Difficultés et propositions', *Bib* 92 (2011) 182–203, at 187; B. R. Trick, *Abrahamic Descent, Testamentary Adoption, and the Law in Galatians: Differentiating Abraham's Sons, Seed, and Children of Promise* (NovTSup 169; Leiden: Brill, 2016) 83; E. McCaulley, *Sharing in the Son's Inheritance: Davidic Messianism and Paul's Worldwide Interpretation of the Abrahamic Land Promise in Galatians* (LNTS 608; London: T&T Clark, 2019) 116.

⁵ H. D. Betz, *Galatians: A Commentary on Paul's Letter to the Churches in Galatia* (Hermeneia; Philadelphia: Fortress, 1979) 145 n. 71; C. D. Stanley, "'Under a Curse": A Fresh Reading of Galatians 3.10–14', *NTS* 36 (1990) 481–511, at 482; Wright, *Climax*, 145; J. M. Scott, "'For as Many as are of Works of the Law are under a Curse" (Galatians 3.10)', *Paul and the Scriptures of Israel* (ed. C. A. Evans and J. A. Sanders; JSNTSup 83; Sheffield: JSOT Press, 1993) 187–221, at 188; R. J. Morales, *The Spirit and the Restoration of Israel: New Exodus and New Creation Motifs in Galatians* (WUNT 11/282; Tübingen: Mohr Siebeck, 2010) 88; Aletti, 'L'argumentation', 187. The objection from Phil 3.6 received impetus from the well-known essay by K. Stendahl, 'The Apostle Paul and the Introspective Conscience of the West', *HTR* 56 (1963) 199–215, who found in Phil 3.6 evidence of Paul's 'robust conscience' (200), although he still held that Paul taught the impossibility of keeping the law in Gal 3.10–12 (202).

⁶ N. Bonneau, 'The Logic of Paul's Argument on the Curse of the Law in Galatians 3:10–14', *NovT* 39 (1997) 60–80, at 61; W. Reinbold, 'Gal 3,6–14 und das Problem der Erfüllbarkeit des Gesetzes bei Paulus', *ZNW* 91 (2000) 101–6, at 101; R. B. Hays, *The Faith of Jesus Christ: The Narrative Substructure of Galatians 3:1–4:11* (Biblical Resource Series; Grand Rapids: Eerdmans, 2002²) 178; Stanley, "'Under a Curse'", 482. Similarly, while holding that 3.10 functions as a warning for law-breakers, Aletti, 'L'argumentation', 189 says regarding those Scripture calls righteous, 'L'apôtre doit ainsi aller plus avant et montrer que, même pour ceux-là, l'obéissance aux commandements de la Loi ne saurait faire devenir juste.'

⁷ Gombis, 'The "Transgressor"', 84 n. 9. Similarly, J. D. G. Dunn, 'Works of the Law and the Curse of the Law (Galatians 3.10–14)', *NTS* 31 (1985) 523–42, at 534.

⁸ Schreiner, 'Obedience', 159 n. 30; Kim, *Paul and the New Perspective*, 141; Moo, *Galatians*, 204; H. Räisänen, *Paul and the Law* (Philadelphia: Fortress, 1986) 95–6.

⁹ E.g. Sanders, *Paul, the Law*, 27–9; Reinbold, 'Erfüllbarkeit', 100–1; Morales, *Spirit*, 88.

¹⁰ The connection between these texts is noted by e.g. D. J. Moo, "'Law"', "Works of the Law", and Legalism in Paul', *WTJ* 45 (1983) 73–100, at 97; J. Rohde, *Der Brief des Paulus an die Galater* (THKNT 9; Leipzig: Evangelische Verlagsanstalt, 1989) 141; Wright, *Climax*, 155; N. T. Wright, *Paul and the Faithfulness of God* (Minneapolis: Fortress, 2013) 859 n. 243; Westerholm, *Perspectives*, 375; J. M. G. Barclay, *Paul and the Gift* (Grand Rapids: Eerdmans, 2015) 378 n. 72; Keener, *Galatians*, 190. Fuller consideration is found in F. Thielman, *From Plight to Solution: A Jewish Framework to Understanding Paul's View of the Law in Galatians and Romans* (NovTSup 61; Brill, 1989) 124–30; M. Bachmann, 'Zur Argumentation von Galater 3.10–12', *NTS* 53 (2007) 524–44, at 532–4 (though he does not discuss Ps 143); J. A. Cowan, 'The Curse of the Law, the Covenant, and Anthropology in Galatians 3:10–14: An Examination of Paul's Use of Deuteronomy 27:26', *JBL* 139 (2020) 211–29, at 228. Cowan rightly observes that the significance of Paul's allusion to Ps 143.2 for the interpretation of Gal 3.10 'has rarely been noted'.

texts broadly supports the traditional reading of Gal 3.10, addressing many objections against it and strengthening its plausibility in comparison with alternatives.

Towards these ends, following an overview of interpretations of Gal 3.10, I consider Paul's use of Ps 143.2 in Gal 2.16, show its relevance to the argument of Gal 3.10, then, on that basis, reassess the various proposals for understanding Paul's logic.

1. Interpretations of Gal 3.10

A full engagement with the various understandings of Gal 3.10 is beyond the scope of this article,¹¹ but to set the stage for what follows, I will survey the main lines of interpretation – and mention common criticisms of each – by focusing on the question: what sin does Paul view as incurring the curse of the law in Gal 3.10? Four basic answers to that question have been offered, which I will label *universal*, *potential*, *specific* and *corporate* sin.¹²

1.1 Universal Sin

This is the traditional interpretation described above. The reason those 'of works of the law' are under the curse is that *no one* adequately does the law. Paul's focus is not on a particular kind of sin committed by those of works but on the sinfulness of humanity in general. This view thus has also been described as 'anthropological'.¹³ Objections to it, noted above, have contributed to the development of the following three lines of interpretation.

1.2 Potential Sin

Several interpreters argue that Paul does not claim that those of works are cursed for sinning, but rather that they are threatened with a curse *if they sin*.¹⁴ Paul's aim in 3.10 is to dissuade his readers from taking up the law by showing its potential risk. Proponents of this view commonly hold that whether the law is kept or not is ultimately beside Paul's point; it cannot give righteousness and life.¹⁵ Critics justly question whether this approach adequately accounts for Christ's redemption from a curse in 3.13, which suggests the curse and the sin that incurs it are actual.¹⁶

¹¹ For a more comprehensive review, see Trick, *Abrahamic Descent*, 77–90; R. B. Matlock, 'Helping Paul's Argument Work? The Curse of Galatians 3.10–14', *The Torah in the New Testament: Papers Delivered at the Manchester-Lausanne Seminar of June 2008* (ed. M. Tait and P. Oakes; London: T&T Clark, 2009) 154–79. For discussion of older alternatives, see Schreiner, 'Obedience'.

¹² In addition to these four approaches, some interpreters argue that Paul means to associate the law with the curse without reference to whether or not the law is violated, e.g. Sanders, *Paul, the Law*, 20–3; M. C. de Boer, *Galatians: A Commentary* (NTL; Louisville, KY: Westminster John Knox, 2011) 200: 'Imperfect or incomplete observance of the law does not seem to be the issue for Paul; the problem is the law itself.' Though differing in some respects, this approach resembles the 'potential sin' view described below in that most advocates of the latter view claim that Paul's point does not rest on whether or not the law can be kept. My criticism of the 'potential sin' view (see section 4 below), based on Paul's use of Ps 143.2 in Gal 2.16, will also apply to this approach.

¹³ E.g. Cowan, 'The Curse of the Law', 211; Trick, *Abrahamic Descent*, 82; Moo, *Galatians*, 158; O. Wischmeyer, 'Wie kommt Abraham in den Galaterbrief? Überlegungen zu Gal 3,6–29', *Umstrittener Galaterbrief: Studien zur Situierung und Theologie des Paulus-Schreibens* (ed. M. Bachmann and B. Kollmann; BThSt 106; Neukirchen-Vluyn: Neukirchener, 2010) 211–29, at 125–6.

¹⁴ Stanley, "'Under a Curse'", 500–1; Young, 'Who's Cursed', 88–9; Reinbold, 'Erfüllbarkeit', 98. Similarly, Aletti, 'L'argumentation', 188 speaks of 'le risque de malédiction' and reasons, 'En admettant même que beaucoup aient encouru la malédiction, le v. 10 ne suffit pas comme preuve, car il y a encore tous ceux qui font leurs délices de la Loi de Dieu' (189). Against the view that the expression ὑπὸ κατάραν refers only to the threat of a curse, see Trick, *Abrahamic Descent*, 81 n. 51.

¹⁵ E.g. Reinbold, 'Erfüllbarkeit', 97; Aletti, 'L'argumentation', 189.

¹⁶ Scott, 'Curse', 193; Das, *Paul*, 148; Kim, *Paul and the New Perspective*, 134; Matlock, 'Helping', 175–6.

1.3 Specific Sin

This approach encompasses a variety of interpretations that understand Paul's focus in Gal 3.10 to be on a particular transgression committed by 'those of works of the law', rather than on the sinfulness of humanity in general. The transgression is variously defined: a legalistic attitude that attempts to bribe God,¹⁷ an ethnocentrism that undermines the primacy of faith and excludes Gentiles from the covenant,¹⁸ or a holding of two incompatible confessions.¹⁹ As with the 'potential sin' view, this approach has difficulty maintaining the close relationship between 3.10 and 13 without minimising the scope and significance of Christ's redemption.²⁰

1.4 Corporate Sin

An increasingly popular alternative to the traditional view, especially associated with the work of N. T. Wright and James Scott, argues that 'those of works' are those who identify with Israel, which as a nation has transgressed and fallen under the curse of the law.²¹ Most advocates of this view understand the curse as the exile, which, it is claimed, despite the sixth-century return to the land, was viewed by Paul and many of his Jewish contemporaries as ongoing in their own day.²²

Proponents of this view frequently argue that Paul's concern in Gal 3.10 is not with the transgressions of individuals but with the historic failure of the nation.²³ Such a distinction is seen as allowing this view to avoid the supposed weaknesses of the traditional reading, i.e. its neglect of the provision for sin in the sacrificial system and Paul's own robust conscience with regard to his righteousness in the law.²⁴

The denial or minimisation of a concern for the transgressions of individuals in Gal 3.10 has become a key point of debate between critics and advocates of this approach, especially with regard to Paul's use of Deut 27.26 in Gal 3.10. While proponents argue

¹⁷ Fuller, 'Paul and "the Works of the Law"', 33.

¹⁸ Dunn, 'Works of the Law', 534; Dunn, *Galatians*, 173. Similarly, see D. Garlington, 'Role Reversal and Paul's Use of Scripture in Galatians 3.10-13', *JSNT* 19/65 (1997) 85-121, at 86, 109, 120, who argues that those of works are cursed because they fail to love and to fulfil the eschatological design of the law for the unity of Jew and gentile. While agreeing with the theology of the traditional view, M. Silva, 'Abraham, Faith, and Works: Paul's Use of Scripture in Galatians 3:6-14', *WTJ* 63 (2001) 251-67, at 263-4 also argues that Paul's focus in 3.10 is on the specific transgression of Paul's opponents, appealing to 6.13 for support. He finds Garlington's description of their transgression to be plausible (Silva, 'Abraham', 263 n. 36).

¹⁹ Gombis, 'The "Transgressor"', 90; see also 89, 92.

²⁰ The criticism of Dunn's proposal in Westerholm, *Perspectives*, 317-19 may apply *mutatis mutandis* to other views that narrow Paul's focus in 3.10 to a specific kind of transgression.

²¹ Thielman, *Plight*, 65-72; A. B. Caneday, "'Redeemed from the Curse of the Law": The Use of Deut 21:22-23 in Gal 3:13', *TJ* 10 (1989) 185-209, at 195; Wright, *Climax*, 137-56; Scott, 'Curse'; S. J. Hafemann, 'Paul and the Exile of Israel in Galatians 3-4', *Exile: Old Testament, Jewish, and Christian Conceptions* (ed. J. M. Scott; JSJSup 56; Leiden: Brill, 1997) 329-71; J. Willitts, 'Context Matters: Paul's Use of Leviticus 18:5 in Galatians 3:12', *TynBul* 54 (2003) 105-22, at 120; Morales, *Spirit*, 92-6; Barclay, *Paul and the Gift*, 405-6 n. 39; McCaulley, *Sharing*, 115-27. The essay of M. Noth, "'For All Who Rely on Works of the Law Are under a Curse'", *The Laws in the Pentateuch and Other Studies* (trans. D. R. Ap-Thomas; Edinburgh: Oliver & Boyd, 1966) 108-17 was seminal to this approach.

²² However, Morales, *Spirit*, 86-7, 106-9 argues that the curse is better conceptualised as death. This variation is followed by Barclay, *Paul and the Gift*, 405-6 n. 39. On the status of the continuing exile thesis in NT studies, see N. G. Piotrowski, 'The Concept of Exile in Late Second Temple Judaism: A Review of Recent Scholarship', *CBR* 15 (2017) 214-47.

²³ A notable exception is F. Thielman, *Paul and the Law: A Contextual Approach* (Downers Grove, IL: IVP Academic, 1994) 127: '[T]hey are cursed ... because they, as a people and as individuals, have not kept the law.'

²⁴ See especially Wright, *Climax*, 145-6, though the distinction seems more muted in Wright, *Faithfulness*, 1034. In general, the fact that many proponents of this view cite Phil 3.6 as a problem for the traditional interpretation suggests that they see their own reading as avoiding this objection.

that Paul reflects the preoccupation of Deut 28–30 with Israel’s covenant history (its sin, exile and restoration),²⁵ critics claim that that context should not be allowed to blunt the individual language of Deut 27.26 itself and its more immediate setting in Deut 27.²⁶ In my judgement, proponents of this view have not yet convincingly ruled out a concern with individuals in Paul’s use of Deut 27.26.²⁷

1.5 Conclusion

As this brief survey shows, in order to make sense of Paul’s logic in Gal 3.10, interpreters rely on an understanding of the curse-incurring sin that is not explicit in the text.²⁸ Paul’s laconic argumentation makes the broader context of Galatians crucial for determining what sin – if any – he has in mind. For this purpose, I argue, his use of Ps 143.2 in Gal 2.16 is especially relevant.

2. Ps 143.2 in Gal 2.16

Twice in his letters Paul appeals to Ps 143.2 (142.2 LXX) to deny justification by works of the law (Gal 2.16; Rom 3.20).²⁹ Both times he departs from the Greek text³⁰ by adding ἐξ ἔργων νόμου and substituting πᾶσα σάρξ for πᾶς ζῶν. In Gal 2.16, he omits ἐνώπιόν σου; in Rom 3.20, this phrase is changed to ἐνώπιον αὐτοῦ and relocated.

²⁵ Caneday, ‘Redeemed’, 195; Wright, *Climax*, 140, 145–6; Scott, ‘Curse’, 195; Willitts, ‘Context’, 120; Morales, *Spirit*, 91–3; McCaulley, *Sharing*, 117. Most of these authors point to Paul’s blended citation – his substitution of τοῖς γεγραμμένοις ἐν τῷ βιβλίῳ τοῦ νόμου, which resembles a common phrase in Deut 28–30 (28.58, 61; 29.19, 20, 26; 30.10), for the original wording τοῖς λόγοις τοῦ νόμου τούτου in Deut 27.26 – as evidence that Paul meant to appeal to the larger context and its prediction of Israel’s national sin, exile and restoration. However, the significance of this change may be interpreted differently, as discussed by Cowan, ‘The Curse of the Law’, 223. For instance, Bachmann, ‘Zur Argumentation’, 527 claims: ‘Wenn Paulus stattdessen schreibt ἐν τῷ βιβλίῳ τοῦ νόμου, so meint er offenkundig die gesamte Tora – und in ihr genauer alle Regelungen.’

²⁶ A. A. Das, ‘Beyond Covenantal Nomism: Paul, Judaism, and Perfect Obedience’, *Conj* 27 (2001) 234–52, at 243; Matlock, ‘Helping’, 167–8; Trick, *Abrahamic Descent*, 87; Cowan, ‘The Curse of the Law’, 223.

²⁷ Recently, McCaulley, *Sharing*, 120 has advanced the defence of the corporate view by arguing, on the basis of allusions to Deut 29 in CD 3: ‘Second Temple authors could use texts that refer to individuals to speak about national curses.’ However, it may be questioned how much this single example supports a generalisation about Second Temple authors and also whether the allusive references in CD 3 to Deut 29 provide a sufficient parallel to Paul’s explicit citation of Deut 27.26. The individual language of Deut 27.26 remains a weakness for an exclusively corporate view of the sin and curse in Gal 3.10.

²⁸ This observation is generally true even for those who deny that 3.10 contains an implied premise, e.g. Fuller, ‘Paul and “the Works of the Law”’, 33; Bachmann, ‘Zur Argumentation’, 538. Silva, ‘Abraham’, 261–2 rightly notes that unstated assumptions run throughout Paul’s argument.

²⁹ These references to Ps 143.2 in Gal 2.16 and Rom 3.20 are broadly recognised, though scholars differ over whether to describe them as allusions or quotations. In favour of allusion, see e.g. B. Lindars, *New Testament Apologetic* (London: SCM Press, 1961) 224, 239, though he also calls it a ‘quasi-quotation’ (224); D. A. Koch, *Die Schrift als Zeuge des Evangeliums: Untersuchungen zur Verwendung und zum Verständnis der Schrift bei Paulus* (BHT 69; Tübingen: Mohr Siebeck, 1986) 18; R. B. Hays, *Echoes of Scripture in the Letters of Paul* (New Haven: Yale University Press, 1989) 51; J. P. Ware, ‘Law, Christ, and Covenant: Paul’s Theology of the Law in Romans 3:19–20’, *JTS* 62 (2011) 513–40, at 527 n. 41; Moo, *Galatians*, 159. In favour of quotation, see e.g. M. Silva, ‘Galatians’, *Commentary on the New Testament Use of the Old Testament* (ed. G. K. Beale and D. A. Carson; Grand Rapids: Baker Academic, 2007) 785–812, at 790; W. N. Wilder, *Echoes of the Exodus Narrative in the Context and Background of Galatians 5:18* (StBibLit 23; New York: Lang, 2001) 223. R. E. Ciampa, *The Presence and Function of Scripture in Galatians 1 and 2* (WUNT 11/102; Tübingen: Mohr Siebeck, 1998) 182 speaks of ‘allusion ... or interpretive citation’. In this study I use the commoner designation ‘allusion’ while affirming with Silva, ‘Galatians’, 790 that Paul ‘is directly appealing to Ps. 143 as providing some kind of evidence for his doctrine of justification’.

³⁰ A. Rahlfs, ed., *Psalmi cum Odis* (Septuaginta. Societatis Scientiarum Göttingensis auctoritate 10; Göttingen: Vandenhoeck & Ruprecht, 1931) 328.

My present concern with the reference in Gal 2.16 is to show that Paul's denial of justification by works rests on the psalmist's confession of humanity's universal sinfulness. In the following section, I will argue that the same thought explains his charge that 'those of works' are under the law's curse.

2.1 The Context of Paul's Allusion in Galatians

Galatians 2.15–21 is a significant transitional passage in the letter, concluding the autobiographical section of the first two chapters and, more immediately, the account of the incident at Antioch, while also introducing central themes taken up in Paul's direct engagement with the Galatians in chapters 3–6.³¹ Continuing to recount his speech at Antioch,³² Paul describes the knowledge and faith that he shares with Peter (2.15–16), denies that seeking justification in Christ – and thus eating with gentiles – makes Christ a minister of sin (2.17–18), declares that he has died to the law in union with Christ (2.19–20) and claims that if justification through the law were possible, Christ's death would be superfluous (2.21).

While setting forth his common convictions and faith with Peter, Paul negates justification by works of the law three times (2.16). The first negation is part of his statement of the general truth that he and Peter know: οὐ δικαιοῦται ἄνθρωπος ἐξ ἔργων νόμου, 'a person is not justified by works of the law'. The second occurs within the purpose statement for his and Peter's belief in Christ, based on that knowledge:³³ ἵνα δικαιοθῶμεν ἐκ πίστεως Χριστοῦ καὶ οὐκ ἐξ ἔργων νόμου, 'that we may be justified by Christ-faith³⁴ not by the works of the law'. The final negation – in which Paul alludes to Ps 143.2 – provides the grounds for the previous two: ὅτι ἐξ ἔργων νόμου οὐ δικαιοθήσεται πᾶσα σὰρξ, 'for by the works of the law no flesh will be justified'.³⁵ Psalm 143.2 thus serves as the scriptural proof for Paul's denial of justification by works.

2.2 OT Context and Parallels, Use in the Qumran Hodayot

In its original context, Ps 143.2 is part of an individual lament³⁶ within a collection of Davidic psalms in the fifth book of the Psalter (138–45). After invoking the Lord and pleading for mercy (vv. 1–2), David describes the enemy's oppression (vv. 3–4), his response of remembrance (vv. 5–6), and his prayer for deliverance and guidance (vv. 7–10). The final verses (11–12) echo the language and themes of the opening petition: the Lord's

³¹ On the transitional nature of this text, see B. R. Gaventa, 'Galatians 1 and 2: Autobiography as Paradigm', *NovT* 28 (1986) 309–26, at 317–18.

³² Following e.g. Betz, *Galatians*, 121; Moo, *Galatians*, 153. However, resolving whether all or any of 2.15–21 is part of Paul's speech to Peter is not essential to my argument.

³³ The participle εἰδότες has a causal force: 'since we know ..., we also have believed'.

³⁴ For the present study, it is not necessary to engage in the debate over the nuance of the genitive Χριστοῦ, on which see M. F. Bird and P. M. Sprinkle, eds., *The Faith of Jesus Christ: Exegetical, Biblical, and Theological Studies* (Peabody, MA: Hendrickson, 2010).

³⁵ The prior denials of justification by works in 2.16 probably also echo Ps 143.2, as Ciampa, *Presence*, 182 notes. Lindars, *Apologetic*, 224 sees this as evidence of the text's importance to Paul: 'The manner in which the allusion is introduced in Gal. 2.15f., first as a general statement known to all at the beginning of the sentence, then as a quasi-quotation to clinch the matter at the end of it, suggests that this verse, if not the whole psalm, is another passage which is already fundamental to Paul's thinking.'

³⁶ This classification is widely held, see N. L. DeClaisse-Walford, R. A. Jacobson and B. L. Tanner, *The Book of Psalms* (NICOT; Grand Rapids/Cambridge: Eerdmans, 2014) 980; F.-L. Hossfeld and E. Zenger, *Psalms 3: A Commentary on Psalms 101–150* (trans. L. M. Maloney; Hermeneia; Minneapolis: Fortress, 2005) 571.

righteousness (vv. 1, 11) and the psalmist as the Lord's servant (vv. 2, 12).³⁷ In alluding to v. 2, Paul is probably aware of the broader context of the psalm.³⁸

In the petition of v. 2, David identifies himself with the rest of humanity as unrighteous³⁹ and pleads for God not to judge him. Commentators rightly associate this plea with Ps 130.3.⁴⁰ Significantly, both texts connect universal sinfulness with an inability to stand in divine judgement. A similar idea is found in Job 25.4–6 (see also 15.14–16), one among other parallels observed between Ps 143 and wisdom literature.⁴¹

In post-biblical Jewish writings, allusions to Ps 143.2 are frequent in the Qumran Thanksgiving Hymns. In 1QH^a 15.31–3, the psalmist says: '[W]ho can be justified before You, when he enters into judgment [*sic*]?' ... But all the children of Your truth You bring before You in forgiveness, cleansing them from their rebellious acts.⁴² This and other allusions to Ps 143.2 (see 1QH^a 8.29; 17.14–15) underscore the conviction that apart from God's mercy, no one can endure God's judgement.⁴³

2.3 The Function and Adaptation of Ps 143.2 in Gal 2.16

The language of Ps 143.2, its parallels with other OT texts and its use in the Qumran *Hodayot* suggest that when Paul alludes to it in Gal 2.16, he not only restates, with Scriptural authority, his denial of justification by works but also provides the reason for this denial, i.e. humanity's universal sinfulness. No flesh will be justified by works of the law because no flesh is righteous. Underlying the denial of a favourable verdict (*δικαιωθήσεται*) is a denial of moral adequacy. This understanding of the function of Paul's allusion is further supported by his use of Ps 143.2 in Rom 3.20, where it follows the lengthy indictment of humanity's sinfulness in Rom 3.10–18.

³⁷ Among the various proposals for the structure of the psalm, commentators generally agree that the opening two verses are an invocation and that the psalm divides in half between verses 6 and 7. The outline proposed here mostly follows that of Hossfeld and Zenger, *Psalms 101–150*, 572. On the *inclusio* between vv. 1–2 and 11–12, see M. Müller, 'Die Vergewisserung einer Beziehung: Eine Auslegung zu Ps 143 und seine liturgische Verortung', *BN* 151 (2011) 71–94, at 77–8.

³⁸ See R. B. Hays, 'Psalm 143 and the Logic of Romans 3', *JBL* 99 (1980) 107–15; Thielman, *Plight*, 64; Wilder, *Echoes*, 175–249.

³⁹ *DCH* 7 s.v. 'צַדִּיק' lists Ps 143.2 under the meaning 'be declared righteous, be justified, be vindicated', but also notes that this meaning is not always clearly distinguishable from 'be righteous, be innocent, be blameless, be right'. Even if the verb refers to judicial declaration or standing rather than moral righteousness, that declaration is based on the evaluation of the person's moral condition, a point confirmed by the parallels with Ps 130.3 and Job 25.4–6, noted below. Thus, whether the verb here is translated 'be declared/found righteous', 'be in the right' or 'be righteous', commentators rightly recognise that v. 2 confesses humanity's universal sinfulness. See e.g. L. C. Allen, *Psalms 101–150* (WBC 21; Nashville, TN: Thomas Nelson, 1983) 355, 'general sinfulness'; S. Terrien, *The Psalms: Strophic Structure and Theological Commentary* (ECC; Grand Rapids: Eerdmans, 2003) 893, 'none is sinless in the divine presence'; Hossfeld and Zenger, *Psalms 101–150*, 573, 'sinful weakness'; DeClaisse-Walford, Jacobson and Tanner, *The Book of Psalms*, 981, 'The singer of Psalm 143:2 does not proclaim innocence, but appeals to the common human condition.'

⁴⁰ Allen, *Psalms 101–150*, 355: 'Alongside the confession of general sinfulness in v 2b, one may set Ps 130:3. These two psalms are rare in implying that the covenant relationship can be sustained only on the basis of continual divine forgiveness'; see also H. McKeating, 'Divine Forgiveness in the Psalms', *SJT* 18 (1965) 69–83, at 76; H.-J. Kraus, *Psalms 60–150: A Commentary* (trans. H. C. Oswald; Minneapolis: Augsburg, 1989) 536; J. L. Mays, *Psalms* (IBC; Louisville, KY: Westminster John Knox, 1994) 433; Hossfeld and Zenger, *Psalms 101–150*, 573.

⁴¹ Hossfeld and Zenger, *Psalms 101–150*, 572–3; DeClaisse-Walford, Jacobson and Tanner, *The Book of Psalms*, 981.

⁴² Translation and versification from M. O. Wise, M. G. Abegg and E. M. Cook, *The Dead Sea Scrolls: A New Translation* (revised and updated edn; New York: HarperCollins, 2005).

⁴³ See fuller discussion in Ware, 'Law', 534–5; F. Mussner, *Der Galaterbrief* (2nd ed.; HThKNT; Freiburg im Breisgau: Herder, 1974) 168–9.

This thought of universal sinfulness may also come to expression in Paul's changes to the Greek text of the psalm. Paul's addition of ἐξ ἔργων νόμου applies the meaning of Ps 143.2 to the crises in Antioch and Galatia. While, as the context shows, ἔργα νόμου distinguish Jew from gentile, the inclusion of this phrase in the allusion to Ps 143.2 suggests that these works have moral significance: they contribute to or constitute one's moral standing before God.⁴⁴ Paul's reasoning is that because of the ubiquity of sin, works of the law cannot serve as the basis for justification.⁴⁵

Paul also departs from the Septuagint by using πᾶσα σὰρξ instead of πᾶς ζῶν. Whether this reflects a different textual tradition,⁴⁶ or is a conscious or unintentional change,⁴⁷ πᾶσα σὰρξ fits well within Paul's anthropological terms. It is possible that here the phrase refers to humanity not only in its creatureliness but also in its corruption (Gal 5.16–21).⁴⁸ As πᾶς ζῶν may echo Gen 2.7,⁴⁹ πᾶσα σὰρξ may echo Gen 6.12, which fittingly declares that 'all flesh corrupted its way on the earth'.⁵⁰ While this understanding of πᾶσα σὰρξ in 2.16 is not essential to my interpretation of Paul's use of Ps 143, if accepted, it further corroborates that Paul presents universal sinfulness as the reason why justification cannot come by works of the law.

Paul's use of Ps 143.2 in Gal 2.16 is basic for his subsequent argument. As Barnabas Lindars observes, 'Gal. 3 works out the argument on the works of the Law and faith, which has been adumbrated by means of Ps. 143.2'.⁵¹ This point holds true for the logic of Gal 3.10.

3. Ps 143.2 and Gal 3.10

In Gal 3 Paul turns from describing the Antioch incident to addressing the Galatians directly, urging them not to adopt the practices and perspective of the agitators. The chapter begins with Paul's argument from the Galatians' experience of the Spirit (3.1–5) and concludes with an affirmation of their identity in Christ as the sons of God and seed of Abraham (3.6–14). Within this frame of direct address,⁵² his argument twice moves in historical progression from Abraham, to the law, to Christ (3.6–14; 15–24). In 3.6–14, Paul appeals to Abraham to show that righteousness, sonship and blessing would come to the gentiles by faith, not by works of the law (3.6–9; the contrast is implied in light of

⁴⁴ Wilder, *Echoes*, 224–5; Silva, 'Galatians', 791. This understanding of works is not strictly necessary to my argument here. Even if Paul's focus in Gal 2.16 is on works as boundary markers, his denial of works as a basis for justification could still rest on the idea of universal sinfulness in Ps 143.2. Paul's point would then be, as Dunn, *Galatians*, 140 says: 'If no one could claim to be sinless or just before God, that included members of the covenant people' (emphasis original). However, Paul's addition of ἐξ ἔργων νόμου makes more sense as an interpretive expansion of the psalm text if ἔργα νόμου are understood not only as distinguishing Jew from gentile but also as contributing to or constituting moral worth. Paul's use of ἔργα elsewhere with this sense, e.g. Rom 9.11, adds weight to this interpretation. For further defence of this understanding of ἔργα νόμου in Paul, see Moo, "'Law", "Works of the Law", and Legalism in Paul', 92–6.

⁴⁵ Rightly, Keener, *Galatians*, 190.

⁴⁶ The reference to Ps 143.2 in 1 En 81.5 also has 'all flesh', as noted by C. H. Cosgrove, 'Justification in Paul: A Linguistic and Theological Reflection', *JBL* 106 (1987) 653–70, at 655 n. 9.

⁴⁷ Silva, 'Galatians', 790 suggests that Paul quotes freely from memory, using a more common biblical phrase.

⁴⁸ Thielman, *Plight*, 63; Wilder, *Echoes*, 231, 236; T. R. Schreiner, *Galatians* (ZECNT 9; Grand Rapids: Zondervan, 2010) 166–7; Dunn, *Galatians*, 140, who also sees a reference to 'the realm where outward and ethnic distinction is most clearly marked'. By contrast, Cosgrove, 'Justification', 655 n. 9 argues that σὰρξ is neutral, in parallel with ἄνθρωπος at the beginning of 2.16.

⁴⁹ Hossfeld and Zenger, *Psalms 101–150*, 573.

⁵⁰ T. Pola, 'Psalm 143: der siebte Busspsalm', *TBei* 34 (2003) 34–40, at 38.

⁵¹ Lindars, *Apologetic*, 224.

⁵² Both sections, Gal 3.1–5 and 3.26–29, are set off by Paul's frequent use of the second person plural, which he employs nowhere else in the chapter.

3.1–5). This point is reiterated by way of contrast in 3.10–14, where he speaks of the curse of the law, borne by Christ (3.10–14).

My contention is that Paul's claim that those of works are under a curse rests on the same basis, expressed by Ps 143.2, as his denial of justification by works in Gal 2.16. The relevance of his use of Ps 143.2 in Gal 2.16 to Gal 3.10 may be seen in three ways: (1) the function of Gal 2.15–21 in Galatians, (2) the unique terminological correspondence between Gal 2.16 and 3.9–11, and (3) the logical similarity between 2.16 and 3.10.

3.1 The Function of Gal 2.15–21

As noted above, Gal 2.15–21 provides a core expression of Galatians' theology, introducing key terms and concepts that will be revisited in the remainder of Paul's argument. The programmatic function of this passage is widely recognised.⁵³ Thus, in seeking to discern an implicit premise or unstated assumption in Gal 3.10, it is natural to look to this passage. As Timothy Gombis says regarding his interpretation of 3.10–14, 'My proposal is an attempt to read Paul and his letter according to the words he uses and the logic that he develops, most explicitly stated within the passage regarded by scholars as the theological and rhetorical "core" of the letter – 2.15–21.'⁵⁴ But which of Paul's statements in Gal 2.15–21 most contributes to the argument in 3.10? Whereas Gombis appeals to his interpretation of 'transgression' in 2.18, the terminological and conceptual ties with 2.16 suggest that 2.16 especially informs the argument of 3.10.⁵⁵

3.2 Terminological Correspondences with Gal 2.16

There are distinctive terminological correspondences between Gal 3.10 and its immediate context and 2.16. Most significantly, within the foundational passage of 2.15–21, the contrast between πίστις and ἔργα νόμου occurs only in 2.16. In chapters 3–6, the contrast occurs again only in 3.2, 5 and 9–11; these verses clearly carry forward the contrast introduced in 2.16. Moreover, only in 2.16 and 3.10–11 is this faith–works contrast combined with a denial of justification.⁵⁶

Thus, within Gal 2.15–21, it is 2.16 that most closely corresponds to 3.10 (or 3.9–11). Conversely, although the language of 2.16 is deployed elsewhere in chapters 3–6, arguably no other text in these chapters has such a rich concentration of terms from 2.16 as 3.9–11. The unique terminological relation between these texts provides a presumptive argument that if an unstated premise or assumption in 3.10 is to be found within Galatians, 2.16 is the most promising candidate.

3.3 Logical Similarity with Gal 2.16

Finally, Gal 3.10 is logically similar to 2.16. Although the language of curse, so prominent in 3.10–14, does not occur in 2.16, 3.7–10 shows that being under a curse is tantamount to

⁵³ Betz, *Galatians*, 114; T. L. Donaldson, 'The "Curse of the Law" and the Inclusion of the Gentiles: Galatians 3.13–14', *NTS* 32 (1986) 94–112, at 97; Dunn, *Galatians*, 132; F. J. Matera, *Galatians* (Collegeville, MN: Liturgical Press, 2007) 98; Gombis, 'The "Transgressor"', 86; Moo, *Galatians*, 153–4; Keener, *Galatians*, 167.

⁵⁴ Gombis, 'The "Transgressor"', 86. See similarly Bonneau, 'Logic', 80.

⁵⁵ The likelihood that within 2.15–21 Paul draws especially from 2.16 is further strengthened by the fact that it is in 2.15–16 that Paul sets forth '[t]he points of presumed agreement' (Betz, *Galatians*, 114); see also Keener, *Galatians*, 171–2. This statement of common ground would be a natural basis for argument.

⁵⁶ Compare οὐ δικαιούται ἄνθρωπος ἐξ ἔργων νόμου in 2.16 with ἐν νόμῳ οὐδεὶς δικαιούται in 3.11. These are the only two verses in Galatians in which the verb δικαιῶ is negated (cf. other occurrences of δικαιῶ in 2.17; 3.8, 24; 5.4).

not being justified. In 3.7–10 blessing and curse are presented as two opposing covenant sanctions.⁵⁷ (The covenantal context is further confirmed by the citation from Deut 27 in 3.10.) As blessing is associated with justification (3.8), so, by implication, *not* being justified is associated with being under the curse.⁵⁸ This association accounts for Paul's swift movement from declaring those of works to be under a curse in 3.10 to denying that anyone can be justified by the law in 3.11.⁵⁹

Since not being justified is associated with being under a curse, the reason for one can also serve as the reason for the other. Paul has already set forth in Gal 2.16 that one cannot be justified ἐξ ἔργων νόμου because of universal sinfulness (Ps 143.2), so it would be fitting for him to assume the same reason in declaring those ἐξ ἔργων νόμου to be under the law's curse in 3.10. That he has this reason in mind, not another, is supported by the function of 2.15–21 and the verbal ties between 2.16 and 3.9–11 just noted. The argument of Gal 3.10 may thus be laid out as follows:

Conclusion: As many as are of works of the law are under a curse.

Major premise, based on Deut 27.26: 'Cursed is everyone who does not remain in all the things written in the book of the law, to do them.'

Implied minor premise, assumed from Gal 2.16: No one is righteous; all sin; no one remains in or does all the things written in the book of the law.⁶⁰

To summarise: the rhetorically foundational role of Gal 2.15–21, the unique terminological correspondence between 2.16 and 3.9–11 and the association of not being justified with being under a curse in 3.8–10 reveal the assumption operative in 3.10. The universal unrighteousness expressed by Ps 143.2 that precludes justification ἐξ ἔργων νόμου also places those ἐξ ἔργων νόμου under the law's curse.

4. Reassessing Interpretations of Gal 3.10

Given this connection between Gal 2.16/Ps 143.2 and Gal 3.10, what can be said for the various interpretations surveyed above of 3.10? Since the sinfulness in view in 2.16 is universal, it is unlikely that Paul has in mind in 3.10 only a specific transgression committed by those of works. While those who take this approach may appeal to other passages in Galatians for support, e.g. 2.18 or 6.13,⁶¹ these texts do not so obviously inform the thought and language of 3.10 as 2.16 does. On the basis of this connection with Ps 143.2, it is also unlikely that Paul has in view merely a potential sin and

⁵⁷ Wright, *Climax*, 142.

⁵⁸ Gal 3.8 so links blessing and justification that it may be reasonably concluded that one cannot be had without the other. Since, as covenant sanctions, blessing and curse are mutually exclusive, jointly exhaustive outcomes, it may also be inferred that those who are not justified are cursed (= not blessed) and vice versa.

⁵⁹ As argued by Moo, *Galatians*, 205, because Paul consistently uses Scripture as a ground in Gal 3.8, 10, 12 and 13, it seems preferable to understand ὅτι ... δῆλον ὅτι in 3.11 in the usual way, 'that ... is evident, for'. However, the increasingly favoured alternative 'because ... it is evident that', defended e.g. by Thielman, *Plight*, 127–8, A. H. Wakefield, *Where to Live: The Hermeneutical Significance of Paul's Citations from Scripture in Galatians 3:1–14*. (AB 14; SBL, 2003) 207–14 and Barclay, *Paul and the Gift*, 406 n. 40, is also compatible with the view of 3.10 proposed here.

⁶⁰ This understanding of the minor premise, of course, assumes that the unrighteous do not remain in or do the law. This equation raises again the question of the law's provision for sin, which will be addressed further below. The point to be noted here is that, as argued in section 2, the thought that 'no one is righteous, all sin' is precisely what is expressed in Ps 143.2 and underlies Paul's denial of justification by works of the law in Gal 2.16. If Paul views this reason as sufficient to exclude justification by works, then he also views it as sufficient to claim that those of works are under a curse, since he associates not being justified with being under a curse.

⁶¹ See Gombis, 'The "Transgressor"', 89–91; Silva, 'Abraham', 263, respectively.

curse.⁶² The traditional view, with its implied premise that no one keeps the law, is preferable to both these alternatives.⁶³

Paul's use of Ps 143.2 in Gal 2.16 also has implications for the view that posits a corporate sin and curse. This reading is attractive for its attention to Deut 27.26 in its original setting and biblical and post-biblical reception and for its appreciation of the covenantal and historical nature of Paul's argument in Gal 3. However, if Paul's reasoning in Gal 3.10 is informed by his use of Ps 143.2 in Gal 2.16, then excluding or downplaying a concern in Gal 3.10 with the sin of individuals seems inappropriate. Since Ps 143 is an individual lament, the context of Paul's allusion is less amenable to a purely corporate reading than that of Deut 27.26 (and this is not to grant that a purely corporate reading is appropriate even based on Deut 27–30). More importantly, the universal, distributive language of Ps 143.2 itself – *πᾶς ζῶν/πᾶσα σάρξ* – resists this reading.⁶⁴ Given the individual focus of the language and context of Ps 143.2, denying Paul's concern with individuals in his citation of Deut 27.26 becomes all the more difficult.

Accenting this concern with individual sin in Gal 3.10 must not and need not overshadow Paul's sweeping covenant-historical train of thought. The plight of the sinner before God is also the plight of the age, characterised by the interaction of the law of Moses with the flesh. Within this epochal framework, Paul may also have in view in 3.10–14 Israel's corporate failure and exile. As 1 Kgs 8.46 shows, the universality of sin comes to expression in Israel's national sin and expulsion from the land.⁶⁵ But Paul is not concerned in Gal 3.10 only with the latter. In this regard, the ascription of Davidic authorship to Ps 143 – no doubt accepted by Paul – may be significant.⁶⁶ In Israel's golden age, well before its exile, David confesses that no one, including himself, is righteous before God.⁶⁷ It is telling that *this* confession becomes the basis of Paul's denial of justification by works in 2.16 and, from there, informs his declaration of a curse on those of works. To focus only on the exile in 3.10 is to overlook Paul's broader interest to characterise the entire age.

If individuals and their sin are in view in Gal 3.10, what of the common objections against the traditional view based on the law's provision for sin and Paul's own robust

⁶² So also it is unlikely that Paul has no sin in mind, but seeks only to associate the curse with the law, as argued by Sanders, *Paul, the Law*, 20–3; de Boer, *Galatians*, 200, noted above.

⁶³ On the basis of the link to Ps 143.2 in Gal 2.16, the traditional view also seems more plausible than the reconstructions of Paul's logic in Bachmann, 'Zur Argumentation' and D. Hunn, 'Galatians 3.10–12: Assumptions and Argumentation', *JSNT* 37 (2015) 253–66. Differing in details, both authors argue that Paul demonstrates that those of works are cursed by appealing to Deut 27.26 in conjunction, not with the traditional implied premise, but with 3.11a, 'no one is justified by the law', which in turn is established by 3.11b–12. However, given the connection with the foundational statement of Gal 2.16 and its use of Ps 143.2, it seems, *pace* Hunn, 257, that Paul expected the Galatians to supply a premise of human sinfulness and inability in conjunction with the threat of Deut 27.26. Thus, while Gal 3.11–12 may reinforce that the law has been violated and the curse incurred, these verses are not necessary to the argument of 3.10 in quite the way that Bachman and Hunn propose.

⁶⁴ This is why Wright's appreciation of the connection between Gal 2.16 and 3.10 in *Climax*, 155 is inadequate: 'The Torah brings the curse for Israel, because Israel has not kept it. I do not mean by this that individual Jews do not keep it fully; that is not what is here at issue ... Rather, Israel as a whole has failed in her task of being the light to the nations ... This is the central affirmation, I think, of 2:16 f.: this is why "by works of the Torah shall no flesh be justified".'

⁶⁵ Affirming both individual and corporate in Gal 3.10–14, see T. R. Schreiner, *The Law and its Fulfillment: A Pauline Theology of Law* (Grand Rapids: Baker, 1993) 49–50.

⁶⁶ Compare Paul's explicit appeal to David in Rom 4.6–8 (Ps 32) as a witness to righteousness apart from works.

⁶⁷ Israel's transgression of the law from the beginning of its history is rightly noted by e.g. Willitts, 'Context', 114; Morales, *Spirit*, 101–3. However, what remains absent from their discussion is the place of universal, individual unrighteousness and inability, expressed by Ps 143.2, in Paul's argument.

conscience? Without fully engaging these objections here, it is fitting to note how the connection between 2.16 and 3.10 addresses them.

First, if the analysis above concerning Paul's use of Ps 143.2 is correct, then the supposedly improbable traditional premise in Gal 3.10 is already present in 2.16. Thus, however it is to be reconciled with these objections, it cannot, because of them, be ruled out for 3.10.

Second, Ps 143.2 may also shed light on *why* these concerns are compatible with the traditional premise. David's confession in Ps 143.2 differs markedly from his appeals elsewhere to his own righteousness (Pss 7.3–5, 8; 26.1; 35.24; see 18.20–4),⁶⁸ yet these statements are not irreconcilable. The positive references to his righteousness seem to construe it relatively – limited to the particular circumstance of the psalm and in comparison with his enemy, or perhaps reflecting David's exemplary faithfulness to the Lord, including his contrition for sins committed. By contrast, the prayer of Ps 143.2 considers righteousness absolutely, referring to one's moral condition before God apart from his mercy. In this absolute sense, 'no living being is righteous before you'. The relationship between David's denial of and appeals to his righteousness may roughly correspond to Paul's implied premise in Gal 3.10 and his claim to blamelessness in Phil 3.6.⁶⁹

With regard to the law's provision for sin in sacrifice, as James Ware notes, David in Ps 143.2 does not deny God's covenant mercy, but highlights his helplessness without it.⁷⁰ Paul's denial of justification by works of the law likewise considers the performance of the law apart from the promise of mercy, mercy that is now climactically expressed in Christ (Rom 3.25).⁷¹ As the law's provision for sin does not preclude David's confession in Ps 143.2, so does it not contradict a premise of human inability in Gal 3.10.

5. Conclusion

Advocates and critics of the traditional understanding of Gal 3.10 rarely address in detail, if at all, the relationship between Paul's use of Ps 143.2 in Gal 2.16 and his logic in 3.10. This is unfortunate if, as has been argued here, Paul's reasoning in 3.10 is not only illuminated but directly informed by his appeal to Ps 143.2. Paul, I have contended, rests his denial of justification by works of the law in Gal 2.16 on the confession of humanity's sinfulness in Ps 143.2. The function of Gal 2.15–21 in his subsequent argument, key verbal correspondences between 2.16 and 3.9–11 and the association of not being justified with being under the curse strongly suggest that the same thought is operative in 3.10. The general unrighteousness of humanity (Ps 143.2) that excludes justification by works (Gal 2.16) also brings those of works under a curse (3.10).

This point broadly supports the traditional understanding of Gal 3.10 over against alternatives. Rather than merely threatening a curse or condemning those of works for a particular transgression, Paul implies that they are under a curse because as sinners they do not live up to the law's demand, expressed by Deut 27.26. Moreover, the universal, distributive language of Ps 143.2 affirms that Paul's concern in citing Deut 27.26 is not simply with Israel's national failure and curse. Israel's corporate history may still be in

⁶⁸ Pola, 'Psalm 143: der siebte Busspsalm', 36.

⁶⁹ See similarly M. Silva, *Philippians* (BECNT; Grand Rapids: Baker Academic, 2005²) 151–2, noting Luke's description of Elizabeth and Zechariah as 'righteous' and 'blameless' (Luke 1.6). Likewise, J. M. Espy, 'Paul's "Robust Conscience" Re-Examined', *NTS* 31 (1985) 161–88, at 165–6 argues that Paul's 'blamelessness' refers to the scrupulosity of the Pharisees, which, though commendable, is not to be identified with sinless perfection. Alternatively, the fact that Paul sees it as an achievement of the flesh in contrast with the Spirit (Phil 3.3) may indicate a more negative evaluation, as argued by Westerholm, *Perspectives*, 403.

⁷⁰ Ware, 'Law', 532.

⁷¹ Ware, 'Law', 535–7.

view in Gal 3.10–14, but in any case, a concern for individuals' sin and curse in the passage should not be denied or made peripheral. Rather, this interest in individual sin and curse must be integrated with Paul's sweeping redemptive-historical argumentation in Gal 3.

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