

THE ROLE THE LAW DOES OR DOES NOT PLAY IN THE CONDEMNATION OF GENTILES IN ROM 2:12–15

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Abstract: *While much has been written on the Mosaic law's relationship to believing Gentiles, less attention has been given to what role the law may have in the condemnation of unbelieving Gentiles. Some texts appear to affirm that the law condemns all humanity. Yet Rom 2:12–15 seems to suggest that the Mosaic law will have no role in condemning Gentile sinners. Those who have sinned ἀνόμως perish ἀνόμως. Essential to this question is the ongoing debate concerning the identity of the Gentiles in 2:14–15, who, though not having the law, do the law. Authors such as Kühr, Moo, Schreiner, and Witherington see these Gentiles as unbelievers, while authors such as Flückiger, Jewett, Wright, Gathercole, and Cranfield see them as new covenant believers. Because of such focus on the identity of those described in 2:14–15, less attention is given to what Paul says about the role νόμος plays at the judgment. Thus, while we argue that Paul describes unbelievers in 2:14–15, our focus is on whether the law will factor into the final judgment of Gentiles. It is our contention that, although Paul initially asserts a categorical distinction between how God will judge Jews and Gentiles in regard to the law (2:12), he immediately minimizes and virtually nullifies this very distinction (2:14–15). The degree to which νόμος functions as a criterion for judgment differs between Jews and Gentiles (2:12); but νόμος will nonetheless stand as a witness, alongside conscience, condemning Jew and Gentile for failure to keep its righteous requirements.*

Key Words: *Law, Paul, condemnation, Gentiles, Romans, judgment.*

In Rom 1:18–3:20, Paul writes the lengthiest sustained explanation of the condemnation of humanity in Scripture. This section begins with the revelation of the wrath of God upon all ungodliness and unrighteousness (1:18), and it concludes with a litany of citations from the OT asserting that humanity is both unrighteous and ungodly (3:10–18). No one will have an excuse before God on judgment day; every mouth will be shut (3:19).

This larger section of Romans is comprised of three primary movements. The first focuses on the condemnation of humanity, especially Gentiles (1:18–32). In the second, Paul brings an indictment against his countrymen, arguing that neither possession of νόμος nor the practice of the covenant sign is sufficient to spare a Jew from the wrath of God (2:1–3:8). Before his final summary in 3:19–20, Paul strings together six scriptural citations to support his position that all, both Jews and Gentiles, are ὑφ' ἁμαρτίαν (3:9–18).

Near the center of the Jewish indictment in 2:1–3:8, Paul mentions νόμος for the first time in Romans. In doing so, he makes an unparalleled statement concern-

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ing the role of νόμος at the final judgment. “For all who have sinned without the law [ἀνόμως] will also perish without the law [ἀνόμως], and all who have sinned under the law [ἐν νόμῳ] will be judged by the law [διὰ νόμου]” (2:12).¹ Paul’s emphasis is that all who sin will be judged. Those who sin ἐν νόμῳ will be condemned just as surely as those who sin ἀνόμως. That sinners will perish is certainly not unique to 2:12; what is unique, however, is that Paul explicitly contrasts how νόμος functions at the judgment of the ἄνομος and those ἐν νόμῳ.²

According to 2:12, those who sin ἐν νόμῳ are judged διὰ νόμου, but those who sin ἀνόμως perish ἀνόμως. At face value, this text is Paul’s clearest statement that Gentile sinners will not be held accountable to the law of Moses at the final judgment. In various strands of the Reformed tradition, however, it is common to view all unbelievers as condemned by the law of Moses (e.g. Calvin’s first use of the law; the “moral law” in the Westminster Confession). Furthermore, it is a commonplace in practical experience for many believers to use the Ten Commandments with unbelievers in a way that suggests that all unbelievers are accountable for breaking the law of Moses.

Romans 2:12–16 is not the only text related to this broader discussion, but it is certainly one of the most relevant and contested. In recent years, numerous scholars have argued over the correct interpretation of this passage. Central to those debates, however, has been a different question. The debates have focused on the identity of the Gentiles described in 2:14–15, who, though not having the law, do the law. Are these Gentiles believers or unbelievers? Authors such as Das, Kuhr, Moo, Schreiner, and Witherington see the Gentiles in 2:14–15 as the Gentile sinners of 2:12a, while authors such as Wright, Gathercole, Jewett, Snodgrass, and Cranfield see them as new covenant believers.³

¹ All biblical quotations are from the ESV 2011 update, unless otherwise noted. The ESV translation of ἀνόμως as “without the law” (NIV: “apart from the law”) is followed by most commentators and is in line with BDAG’s preferred definition for this text. This translation is justifiable within the context in light of Rom 2:14 where Paul speaks of those who “do not have the law” [τὰ μὴ νόμον ἔχοντα]. Furthermore, ἀνόμως is contrasted with ἐν νόμῳ, which likely refers to being “in the realm of the law.” Though ἀνόμως could have a negative connotation (e.g. “lawlessly”) in line with the usage of ἄνομος in 1 Tim 1:9, ἀνόμως in Rom 2:12 is more reflective of 1 Cor 9:21 where Paul uses ἄνομος four times to describe those who live without reference to the Mosaic law. In that text, Paul is not criticizing people by saying they are ἄνομος, but is simply showing his “empathy for those outside the Mosaic tradition” (BDAG 85). Paul’s use of ἀνόμως in Rom 2:12 is likewise not implying criticism; it is the *sinning* of these people that is the problem. BDAG rightly suggests that ἀνόμως in 2:12 is equivalent to Paul’s description in Rom 7:9 of his being alive once *χωρὶς νόμου*.

² For readability, when contrasting the two groups from Rom 2:12 (i.e. those apart from the law and those within the law’s realm), the Greek adjective ἄνομος will be used to describe those “without the law” rather than the adverb ἀνόμως found within Rom 2:12.

³ These two basic views are the most common in the secondary literature and will serve as helpful categories for discussing the role of the law and Gentile condemnation. Nevertheless, there are other variations that have been proposed as well. Sanders and Räisänen, for example, both suggest that Paul is describing non-Christian Gentiles who do the law and will be justified; see E. P. Sanders, *Paul, the Law, and the Jewish People* (Minneapolis: Fortress, 1983; repr., 2009), 123–35; and Heikki Räisänen, *Paul and the Law* (2nd ed.; Tübingen: Mohr Siebeck, 1983; repr. Eugene, OR: Wipf & Stock, 2010), 97–109. Sanders suggests that Paul did not compose this section, but rather incorporated “homiletical material from Diaspora Judaism” (*Paul, the Law*, 123). Räisänen suggests that, since Paul’s focus is on the Jews, he

Because of such focus on the identity of those described in 2:14–15, less attention is given to what Paul says about how νόμος functions at the final judgment of Gentile sinners. Thus, though we address the identity of the Gentiles in 2:14–15, our focus is on the role the law of Moses does or does not play in the condemnation of Gentile sinners.

I. SETTING THE CONTEXT FOR ROM 2:12–16

The first key to interpreting 2:12–16 is to identify the relationship of this paragraph to 2:1–11. After Paul's focus on God's wrath in 1:18–32, especially as it relates to idolatry and homosexuality, it could seem his target audience was exclusively Gentile. In 2:1, however, Paul unexpectedly begins a diatribe against the Jew.⁴ "Therefore you have no excuse, O man, every one of you who judges. For in passing judgment on another you condemn yourself, because you, the judge, practice the very same things" (2:1). Paul's initial indictment ends in 2:4–5. Though God's kindness was intended to lead Jews to repentance, because of their hard, unrepentant hearts they have treasured up God's wrath for the final day.

In 2:6–11, Paul moves from indictment to supporting arguments. God is impartial (2:11) and therefore gives to every person in accordance with what that person has done (2:6). The paragraph is structured chiasmically with God's wrath at its center (2:8–9). Since God is impartial (2:11), he rewards good work impartially—granting eternal life, glory, and honor to every person who does good (2:7, 10). But

suggests, "without noticing it," that Gentiles are able to do the law. "When Paul is not reflecting on the situation of the Gentiles, it is quite natural for him to think that they can fulfil the law" (*Paul and the Law*, 106). For both authors, Rom 2:12–16 contains significant contradictions to what Paul says elsewhere in Romans. From a different angle, Douglas Campbell's rereading of Rom 1:18–32 as representing the position of a "Teacher" in Rome opposed to Paul leads to quite different conclusions on the entire argument and purpose of Rom 2, not just Rom 2:14–15; Douglas A. Campbell, *The Deliverance of God: An Apocalyptic Rereading of Justification in Paul* (Grand Rapids: Eerdmans, 2009), 542–71. In Campbell's reading, much of Rom 2 is Paul's rebuttal of the "Teacher's" misunderstanding of God's righteousness as retributive justice and his promotion of "the principle of desert" in Rom 1:18–32 (p. 551). Thus, the implications of Campbell's reading of Rom 2:14–15 to our driving question of how Gentile condemnation relates to the Mosaic law are not particularly clear.

⁴ For an exhaustive treatment of the usage and function of diatribe in Romans, see Stanley K. Stowers, *The Diatribe and Paul's Letter to the Romans* (SBLDS 57; Chico, CA: Scholars, 1981). In regard to the identity of the interlocutor in 2:1ff, Rodríguez certainly makes an interesting case for the audience of Romans being exclusively Gentile; Rafael Rodríguez, *If You Call Yourself a Jew: Reappraising Paul's Letter to the Romans* (Eugene, OR: Cascade Books, 2014). Similarly, see Runar M. Thorsteinsson, *Paul's Interlocutor in Romans 2: Function and Identity in the Context of Ancient Epistolography* (ConBNT 40; Stockholm: Almqvist & Wiksell International, 2003), 188–96. This issue is not critical to this article, yet we still find it more likely that Rom 2:1 begins a diatribe focused on a Jewish interlocutor. While Paul's dialogue partner is initially addressed in general terms, Paul clarifies in Rom 2:17 that his indictment is directed specifically toward Jews. This reading leads well into Rom 2:28–29 where Paul focuses on the value of being a Jew internally rather than externally. Furthermore, in our view, the language of Rom 1:18–32 is drawn largely from OT texts about rebellious Israel. Thus, though Gentiles are the focal point in Rom 1:18–32, complacent Jews are also in view implicitly. For detailed discussion of how Paul evokes Psalm 106, in particular, in Rom 1:18–32, see Alec J. Lucas, *Evocations of the Calf?: Romans 1:18–2:11 and the Substructure of Psalm 106 (105)* (BZNTW 201; Berlin: de Gruyter, 2014).

God also rewards unrighteousness impartially—pouring out wrath, fury, and distress on every person who does evil (2:8–9).

Table 1. The Chiastic Structure of Rom 2:6–11

2:6	A: <i>ὅς ἀποδώσει ἐκάστῳ κατὰ τὰ ἔργα αὐτοῦ·</i>	
2:7	B: <i>τοῖς μὲν καθ' ὑπομονὴν ἔργου ἀγαθοῦ</i> <i>δόξαν καὶ τιμὴν καὶ ἀφθαρσίαν ζητοῦσιν ζῶν αἰώνιον,</i>	
2:8	C: <i>τοῖς δὲ ἐξ ἐριθείας καὶ ἀπειθοῦσι τῇ ἀληθείᾳ</i> <i>πειθόμενοι δὲ τῇ ἀδικίᾳ</i>	<i>ὀργὴ καὶ θυμὸς.</i>
2:9		<i>θλίψις καὶ στενοχωρία</i>
2:10	<i>Ὑ: ἐπὶ πᾶσαν ψυχὴν ἀνθρώπου</i> <i>τοῦ κατεργαζομένου τὸ κακόν,</i> <i>Ἰουδαίου τε πρῶτον καὶ Ἑλληνος·</i>	<i>δόξα δὲ</i> <i>καὶ τιμὴ</i> <i>καὶ εἰρήνη</i>
2:11	<i>Β: παντὶ τῷ ἐργαζομένῳ τὸ ἀγαθόν,</i> <i>Ἰουδαίῳ τε πρῶτον καὶ Ἑλληνι·</i> <i>Α: οὐ γὰρ ἐστὶν προσωποληψία παρὰ τῷ θεῷ.</i>	

Paul not only emphasizes God's wrath and impartiality, however; he also underscores the universal scope of the judgment. God repays each person [*ἐκάστῳ*] according to his or her works (2:6). To every person [*πᾶσαν ψυχὴν ἀνθρώπου*] who works *τὸ κακόν*, God gives wrath and fury—to the Jew first and also the Greek [*Ἰουδαίῳ τε πρῶτον καὶ Ἑλληνος*] (2:8–9). To every person [*παντὶ*] who works *τὸ ἀγαθόν*, God grants glory, honor, and peace—to the Jew first and also the Greek [*Ἰουδαίῳ τε πρῶτον καὶ Ἑλληνι*] (2:10). God's impartiality demands that he treat all people the same on judgment day (2:11). In particular, God will reward sinful Jews with the same wrath they assume is reserved for Gentiles.

II. PAUL'S INITIAL AFFIRMATION OF EQUALITY IN ROM 2:12

This context leads to Paul's assertion in 2:12. "For all who have sinned without the law will also perish without the law, and all who have sinned under the law will be judged by the law" [*Ὅσοι γὰρ ἀνόμως ἥμαρτον, ἀνόμως καὶ ἀπολοῦνται, καὶ ὅσοι ἐν νόμῳ ἥμαρτον, διὰ νόμου κριθήσονται*]. On the one hand, 2:12 further develops the theme of God's impartial justice (cf. 2:6–11).⁵ This verse reiterates the

⁵ Though we see 2:12 as more transitional—looking back to 2:6–11 and leading into 2:13–16—Das notes well the connection between God's impartiality (2:6–11) and the entire argument of 2:12–16: "Paul addresses in Rom 2:12–16 a logical objection to his claim of divine impartiality in vv. 6–11. God appears to have treated humanity with partiality by providing the Law only to the Jews but not to the

central point of the chiasm: God's wrath is on all who do evil (2:8–9). Since God is impartial, all sinners will be repaid with judgment, whether ἄνομος or ἐν νόμῳ. On the other hand, Paul begins to shift his focus in 2:12 to the relationship of νόμος to the judgment of Jewish and Gentile sinners (cf. 2:13–16).

III. IDENTIFYING THE GENTILES IN ROM 2:14–15

Since Paul's emphasis in 2:12b is on the condemnation of those ἐν νόμῳ, Paul immediately grounds his assertion in 2:13. People who sin ἐν νόμῳ will be judged διὰ νόμου (2:12b) because it is not the hearers of νόμος but the doers who will be justified (2:13). Those who sin (i.e. do not do νόμος) will be condemned, and their judgment will be meted out in accordance with the light they possessed through νόμος.

The following complex verses (2:14–15) raise critical questions concerning the relationship of Gentiles to νόμος, the role of νόμος at the final judgment, and the relationship of conscience to νόμος.⁶ Paul writes, "For when Gentiles, who do not have the law, by nature do what the law requires, they are a law to themselves, even though they do not have the law. They show that the work of the law is written on their hearts, while their conscience also bears witness, and their conflicting thoughts accuse or even excuse them."

1. *Proposal #1: Rom 2:14–15 as an explanation of Rom 2:13.* The interpretation of 2:14–15 depends largely on how the initial γάρ in 2:14 is explained. The argument could be read in at least two ways. First, 2:14–15 might explain 2:13 (Table 2). In this reading, 2:14–15 identifies "the doers of the law" in 2:13.⁷ While the hearers of νόμος are faithless Jews who do not respond to God's νόμος, the doers of νόμος are surprisingly Gentiles. These Gentiles know and obey νόμος because it is written on their hearts. These Gentile law-keepers are *believers* who do good and seek for glory, honor, and immortality (2:7, 10).⁸ They have experienced heart transformation

Gentiles." A. Andrew Das, *Paul and the Jews* (Library of Pauline Studies; Peabody, MA: Hendrickson, 2003), 181.

⁶ Though beyond the scope of this article, the question of how the law affects Gentile condemnation relates to the broader topic of Jewish attitudes toward Gentiles in the Second Temple Period, as well as Paul's view of the uses of the law in Gentile churches. For the broader discussions, see Markus Bockmuehl, *Jewish Law in Gentile Churches: Halakah and the Beginning of Christian Public Ethics* (Edinburgh: T&T Clark, 2000); David C. Sim and James S. McLaren, eds., *Attitudes to Gentiles in Ancient Judaism and Early Christianity* (LNTS 499; London: T&T Clark, 2013); and Peter J. Tomson, *Paul and the Jewish Law: Halakha in the Letters of the Apostle to the Gentiles* (CRINT 3.1; Minneapolis: Fortress, 1990).

⁷ Wright asks, "But who are these 'doers of the law'? Verse 13 is at once further explained (γάρ) by verse 14" ("The Law in Romans 2," in *Paul and the Mosaic Law* [ed. James D. G. Dunn; Grand Rapids: Eerdmans, 2001], 144). For other defenses of 2:14–15 being about believing Gentiles, see Michael Bird, *The Saving Righteousness of God: Studies on Paul, Justification, and the New Perspective* (PBM; Milton Keynes, UK: Paternoster, 2007), 155–78; Felix Flückiger, "Die Werke des Gesetzes bei den Heiden (nach Röm 2:14ff)," TZ 8 (1952): 17–42; and esp. Simon J. Gathercole, "A Law unto Themselves: The Gentiles in Romans 2.14–15 Revisited," JSNT 85 (2002): 27–49. One of Gathercole's strongest arguments is the proximity of οἱ ποιῶνται νόμον in 2:13 and τὰ τοῦ νόμου ποιῶσιν in 2:14 (33–34); yet the relevance of this argument depends largely on how 2:14 is related to 2:13.

⁸ There are a variety of views on how many (if any) texts in Rom 2 (2:7, 10, 13, 26–27) describe the obedience of believers. Schreiner, for example, proposes that the Gentiles in 2:14–15 are unbelievers but

through the Spirit (2:29) and will condemn the physically circumcised who had νόμος but broke it (2:26–27).

Table 2. Proposal #1 of the Argument of Rom 2:12–14

2:12a		“Ὅσοι γὰρ ἀνόμως ἤμαρτον, ἀνόμως καὶ ἀπολούνται,
2:12b		καὶ ὅσοι ἐν νόμῳ ἤμαρτον, διὰ νόμου κριθήσονται.
2:13	Explains 2:12b	οὐ γὰρ οἱ ἀκροαταὶ νόμου δίκαιοι παρὰ [τῷ] θεῷ, ἀλλ’ οἱ ποιηταὶ νόμου δικαιωθήσονται.
2:14	Identifies οἱ ποιηταὶ νόμου from 2:13	ὅταν γὰρ ἔβην τὰ μὴ νόμον ἔχοντα φύσει τὰ τοῦ νόμου ποιῶσιν, οὗτοι νόμον μὴ ἔχοντες ἑαυτοῖς εἰσιν νόμος.

2. *Proposal #2: Rom 2:14–15 as an explanation of Rom 2:12a.* Though Proposal #1 makes sense within both the immediate and surrounding contexts, 2:14–15 could be read differently. In 2:12, Paul compares the destinies of those who sin ἀνόμως and ἐν νόμῳ. Those ἐν νόμῳ are judged διὰ νόμου (2:12b), an assertion grounded in 2:13. Left unexplained, however, are questions raised by 2:12a. To say that those who sin ἀνόμως perish ἀνόμως leaves the reader to wonder, “What are the criteria by which someone who sins ἀνόμως will be judged?” and, “Is it fair that the ἄνομος perish?”

If γὰρ in 2:14 is connected to 2:12a instead of 2:13 (Table 3), the function and the meaning of 2:14–15 are quite different than in Proposal #1.⁹ Rather than identifying “the doers of the law” (2:13), Paul explains the *criteria* for the judgment of the ἄνομος and proves the *fairness* of that judgment. Gentile sinners are worthy of

that 2:7, 10, 13, and 26–27 describe believers; Thomas R. Schreiner, *The Law and Its Fulfillment: A Pauline Theology of Law* (Grand Rapids: Baker, 1993), 193–201. For further discussion of the various approaches to this issue, see Kevin M. McFadden, *Judgment According to Works in Romans: The Meaning and Function of Divine Judgment in Paul’s Most Important Letter* (Minneapolis: Fortress, 2013), 139–53.

⁹ So John Murray, *The Epistle to the Romans* (NICNT; Grand Rapids: Eerdmans, 1968), 72; and esp. Douglas J. Moo, *The Epistle to the Romans* (NICNT; Grand Rapids: Eerdmans, 1996), 149. John Calvin seems to follow this reading as well. Calvin comments on 2:14, “He now states what proves the former clause; for he did not think it enough to condemn us by mere assertion, and only to pronounce on us the just judgment of God; but he proceeds to prove this by reasons.... He indeed shows that ignorance is in vain pretended as an excuse by the Gentiles” (*Commentaries on the Epistles of Paul the Apostle to the Romans* [ed. John Owen; trans. John Owen; Grand Rapids: Baker, 2005], 96). Schreiner’s reading is slightly different than the above proposals. He sees 2:14–15 as being connected to 2:13a as in Proposal #1, but he sees the Gentiles in 2:14–15 as unbelievers as in Proposal #2. In his view, the function of 2:14–15 is to strip away from the Jew any thought that mere possession of νόμος has salvific value. Since Jews could view themselves as superior to Gentiles because of their possession of νόμος, Paul argues that Gentiles too have heard “the law,” but “no Gentile is saved merely by knowing what νόμος the law requires.” Thomas R. Schreiner, *Romans* (BECNT; Grand Rapids: Baker, 1998), 117. In the end, the key tenets of Schreiner’s view overlap significantly with Proposal #2.

judgment since they are not ignorant of God’s requirements. These “law-less” Gentiles have the work of the law etched on their hearts (2:15a). Furthermore, God has instilled within them a conscience that accuses or excuses their actions (2:15b). These two witnesses will testify with one voice against Gentile sinners at the final judgment.¹⁰

Table 3. Proposal #2 of the Argument of Rom 2:12–14

2:12a		“Ὅσοι γὰρ ἀνόμως ἤμαρτον, ἀνόμως καὶ ἀπολοῦνται,
2:12b		καὶ ὅσοι ἐν νόμῳ ἤμαρτον, διὰ νόμου κριθήσονται.
2:13	Explains 2:12b	οὐ γὰρ οἱ ἀκροαταὶ νόμου δίκαιοι παρὰ [τῶ] θεῷ, ἀλλ’ οἱ ποιηταὶ νόμου δικαιοθήσονται.
2:14	Explains 2:12a	ὅταν γὰρ ἔθνη τὰ μὴ νόμον ἔχοντα φύσει τὰ τοῦ νόμου ποιῶσιν, οὗτοι νόμον μὴ ἔχοντες ἑαυτοῖς εἰσιν νόμος.

3. *An Assessment of Proposal #1 on the function of Rom 2:14–15.* Since both proposals are defensible, the decision between them ultimately depends on the weight given to their respective strengths and weaknesses. As stated earlier, identifying the Gentiles in 2:14–15 is not our primary task; nevertheless, one’s position on this issue inevitably influences one’s perspective on the role νόμος plays in the condemnation of Gentile sinners. Thus, we must briefly assess the two proposals before examining the possible answers for how νόμος does or does not affect the ἄνομος at the judgment.

Though Proposal #1 immediately clarifies the identity of “the doers of the law” in 2:13 and provides a coherent, consistent explanation of those who do good (2:10), “the doers of the law” (2:13), and the uncircumcised law-keepers (2:26–27), this proposal has some weaknesses. First, Proposal #1 requires that the “doing” of νόμος that leads to justification in 2:13 be a somewhat consistent (though often faltering), Spirit-enabled, heart obedience to νόμος rather than an obedience which meets all the requirements of νόμος.¹¹ Likewise, the phrase in 2:15, “or even” [ἢ]

¹⁰ τὸ ἔργον τοῦ νόμου ἐν ταῖς καρδίαις αὐτῶν should not be equated with συνείδησις in 2:15. Paul speaks rather of two gifts that make humanity culpable for breaking νόμος. The συμ- prefix in *συμμαρτυρουσῆς* points toward two witnesses testifying at the judgment (ESV: “their conscience *also* bears witness”). Frank Thielman comments correctly, “The law’s basic requirement is written on Gentile hearts, and the consciences of Gentiles are able to measure their conduct against this innate standard” (*The Law and the NT: The Question of Continuity* [CNT; New York: Crossroad, 1999], 22).

¹¹ For the classic expression of the obedience described according to Proposal #1, see C. E. B. Cranfield, *A Critical and Exegetical Commentary on the Epistle to the Romans* (ICC; London: T&T Clark, 1975),

καί], suggests that the primary activity of the conscience and conflicted thoughts is to accuse, rather than to excuse their activities. One could at least question whether such seemingly infrequent obedience would result in justification in light of Paul's emphasis on God's thorough, piercing judgment throughout this context.

Second, this proposal suggests that Romans 2 affirms the existence of people who "do good" and receive eternal life (2:10) and who "do the law" and will be justified (2:13), even though 3:10–20 affirms that no one "does good, not even one" (3:12) and that "by works of the law no human being will be justified in his sight" (3:20). Though reasonable answers can be given to explain this issue, it is at least possible that the development of the argument of 1:18–3:20 as a whole could speak against Proposal #1.¹²

Third, this proposal necessitates that "doing good" and "doing the law" presuppose a person's trust in Jesus's death and resurrection and confession of Jesus as Lord; otherwise, these texts violate Paul's teaching elsewhere in Romans about how right standing with God is gained. If Paul presupposes these things when he speaks of "doing good" and "doing the law" in 2:6–16, it is not particularly clear at this stage in Romans, especially in a letter in which a major goal is to explain plainly the good news of God's righteousness in Christ.¹³

Finally,¹⁴ though the greatest strength of this view is likely that τὸ ἔργον τοῦ νόμου γραπτὸν ἐν ταῖς καρδίαις αὐτῶν in 2:15 appears to allude to the new cove-

1:155. Paul is "thinking of that beginning of grateful obedience to be found in those who believe in Christ, which though very weak and faltering and in no way deserving God's favour, is, as the expression of humble trust in God, well-pleasing in His sight."

¹² Our intent is not to suggest that Proposal #1 ignores the development of 1:18–3:20. According to this view, Rom 2 consistently depicts the people whom God ultimately justifies (2:7, 10, 14–15, 26–29): a largely Gentile group that believes in the Messiah and demonstrates this faith through Spirit-enabled obedience. It is questionable, however, whether Paul intends to make these points *at this point* in Romans.

¹³ Wright argues that 2:26–29 enables readers to look back and understand the identity of those who do good and who do νόμος in 2:1–16. "The Spirit is not, of course, mentioned in Romans 2:1–16. But that is Paul's way: to introduce a theme quietly, symphonically, with hints and suggestions.... When Paul speaks of 'doing the law' in Romans 2:13, he is thereby setting up a long train of thought which will run through several passages until, in Romans 8:5–8, he explains, and even then obliquely, that it is the mind of the flesh that does not and cannot submit to God's law, so that by implication the mind of the Spirit can and does make the submission." N. T. Wright, *Justification: God's Plan & Paul's Vision* (Downers Grove, IL: InterVarsity, 2009), 190.

In principle, we see no problem with Wright's suggestion that Paul uses oblique references to Gentile Christians in 2:7, 10, and 13 that are subsequently clarified in 2:26–29 and the rest of Romans. Yet, Wright finds this same basic argument weak when used for an opposing view. If readers must wait to find out whom Paul is describing in Wright's view, why is it a problem for *others* to propose that 3:10–20, which uses similar language to 2:6–13, later clarifies Paul's view that no one fits the categories proposed in 2:7, 10, and 13?

¹⁴ A related issue that is often discussed concerns the meaning of "by nature" [φύσει] in 2:14. It is possible, in line with most translations, that φύσει describes *how* these Gentiles obey. They do "by nature" the things of νόμος (ESV, KJV, NET, NIV; similarly, HCSB, NAS, NLT, and NRS, all render φύσει as "instinctively?"). It is also possible that Paul could simply be emphasizing that Gentiles do not have νόμος. "When Gentiles, who do not *naturally* [φύσει] have the law, do what the law requires, they are a law to themselves, even though they do not have the law." See Cranfield, *Romans*, 1:156–57; and Robert Jewett, *Romans: A Commentary* (Hermeneia; Minneapolis: Fortress, 2007), 214–15. Good arguments can be marshalled for both views, but, in either case, this decision does not dictate one's position

nant promise in Jer 31:33 (LXX 38:33), the presence of this allusion is not certain.¹⁵ In Jer 31:33 (LXX 38:33), the relevant phrase is ἐπὶ καρδίας αὐτῶν γράψω αὐτούς.¹⁶ The grammar of 2:15 may suggest Paul is *not* applying Jer 31 (LXX 38) to these Gentiles. If Paul stated that “the laws” (νόμους and αὐτούς are plural in LXX Jer 38:33) or “the law” were written on hearts, then an allusion is more certain. Paul’s affirmation, however, is that τὸ ἔργον τοῦ νόμου is written [γραπτόν] on the hearts of Gentiles.¹⁷ Because γραπτόν is neuter, its referent must be the neuter ἔργον, not the masculine νόμου. What is written on Gentiles’ hearts is not νόμος itself, but the work of νόμος (NIV: “the requirements of the law”).¹⁸ Though this grammatical point is indeed noteworthy, it is a contextual matter that may be weightier in this discussion of whether Paul intends to allude to Jer 31:33. Would Paul link the glory of possessing the promise of Jeremiah 31 with having thoughts that *primarily* accuse new covenant members throughout life and ultimately on the final day of judgment?

4. *An Assessment of Proposal #2 on the function of Rom 2:14–15.* Proposal #2 is not without its own weaknesses; thus, it is not surprising that this view has become

on the identity of the Gentiles in Rom 2:14–15; contra Wright who suggests that this issue is “the little rudder around which the whole ship of Paul’s argument here will turn.” Wright, “The Law,” 144.

¹⁵ Das’s critique of Wright on the matter of an allusion to Jeremiah 31 is helpful. Das suggests that Wright overlooks the predominantly “accusing” thoughts that the conscience renders against these Gentiles. “This aspect of the text is not fully appreciated by N. T. Wright.... This is no mere ‘inner conflict,’ as Wright supposes (p. 146), but an objective accountability on the basis of the ‘work of the law’ before God’s judgment.” A. Andrew Das, *Paul, the Law, and the Covenant* (Peabody, MA: Hendrickson, 2001), 180.

¹⁶ Schreiner identifies another significant weakness with seeing an allusion to Jeremiah 31 in Rom 2:14–15. Rom 2:14 says that Gentiles, who do not have the law, are a law to themselves. “To say that the Gentiles are a law to themselves would be an odd way to describe God’s law written on the heart, but it fits nicely with the Greek conception of an unwritten law embedded on every person’s heart.” Schreiner, *Law and Its Fulfillment*, 195. Cf. Leander E. Keck, *Romans* (ANTC; Nashville: Abingdon, 2005), 80.

¹⁷ Moo comments, “It is significant that Paul does *not* say that the law is written on the heart but that the ‘requirements of the law’ (lit., ‘the work of the law’) are. The Gentiles’ innate knowledge of God’s law leads them often to do what is right.” Douglas J. Moo, *Romans* (NIVAC; Grand Rapids: Zondervan, 2000), 86 (italics his). See also Jeffrey S. Lamp, “Paul, the Law, Jews, and Gentiles: A Contextual and Exegetical Reading of Romans 2:12–16,” *JETS* 42 (1999): 47; and Ben Witherington III, *Paul’s Letter to the Romans: A Socio-Rhetorical Commentary* (Grand Rapids: Eerdmans, 2004), 83. Contra Flückiger, “Die Werke,” 34–35; and Adrio Kömig, “Gentiles or Gentile Christians? On the Meaning of Romans 2:12–16,” *JTS* 15 (1976): 59–60. In line with Moo, Kuhr argues that the moral ability in Rom 2:14–15 is sourced in human nature rather than the new covenant of Jeremiah 31. “Der Unterschied ist fundamental: bei Jer ist das ins Herz geschriebene Gesetz eine eschatologische Gabe, die dem Menschen in der Heilszeit zuteil wird, Rm 2 14f. ist es die dem Menschen auf Grund seiner menschlichen Natur eignende Fähigkeit zum sittlichen Handeln.” Friedrich Kuhr, “Römer 2 14f. und die Verheissung bei Jeremia 31 31ff.,” *ZNW* 55 (1964): 260. Though Kuhr is likely correct that Rom 2:14–15 emphasizes human nature, Gathercole’s critique that Kuhr unnecessarily juxtaposes obedience and the new covenant is worth noting. After all, “new covenant obedience *is* God’s eschatological gift” (Gathercole, “A Law unto Themselves,” 42 [italics his]).

¹⁸ Lamp discusses rightly the distinction between τὸ ἔργον τοῦ νόμου in Rom 2:15 and τὰ ἔργα τοῦ νόμου in the rest of Paul’s writings. Paul uses the latter consistently with negative connotations; Lamp, “Paul, the Law,” 47. Schreiner explains τὸ ἔργον τοῦ νόμου succinctly. “The ‘work of the law,’ then, refers to the commands contained in the Mosaic law” (*Romans*, 122).

less popular in recent years. In this assessment, we will highlight four weaknesses of Proposal #2, but will also offer some minor rebuttals to these critiques.

First, Proposal #2 is dependent on the $\gamma\acute{\alpha}\rho$ in 2:14 reaching back to 2:12a, even though there are semantic links between 2:13 and 2:14 in regard to doing the law. In response, one could argue that, though the language of “doing the law” is similar in 2:13 and 2:14, the doing of the law in 2:13 is actually *not* equivalent to the doing of the law in 2:14. In 2:13, doing the law results in *justification*. In 2:14, however, the Gentiles who do the things of the law are primarily accused by their conscience. These accusations, when connected to God’s judgment of the secrets of the heart in 2:16, more likely result in *condemnation* rather than justification. Furthermore, though it may seem unlikely that $\gamma\acute{\alpha}\rho$ in 2:14 points back to 2:12a, it is not uncharacteristic of Paul to use $\gamma\acute{\alpha}\rho$ in this way, nor would this be surprising in view of the tight argumentation and stylistic beauty in 2:6–16 (cf. the chiasm in 2:7–10).¹⁹

A second possible weakness of Proposal #2 is that it leaves the identity of “the doers of the law” of 2:13 unclear. This is not remarkable, however, since Paul’s desire at this point is not to explain who, if any, “does good” in 2:10 or who “the doers of the law” are in 2:13. Paul is articulating how God judges, whom God judges, and why God judges. Paul’s primary concern is not to explain the path to life but rather the certainty of condemnation.

The third and perhaps greatest difficulty for Proposal #2 is that it demands that 2:14–15 not be alluding to the new covenant promise in Jeremiah 31. Our previous discussion of this possible allusion, though not proving the point definitively, at least demonstrates that the issue is open for debate (see notes 15–17 for scholars who would agree).

Finally, it is admittedly abnormal for Paul to speak of the obedience of Gentile sinners (cf. 3:10–18); yet, it is important to recognize the positive value of having both a conscience and the law’s work written on the heart, as well as to recognize the uniqueness of Paul’s argument in 2:12–16 no matter which proposal is accepted. Furthermore, the obedience described is limited and inconsistent. Paul’s point is that Gentile sinners *occasionally* do things required by $\nu\acute{o}\mu\omicron\varsigma$, and this obedience demonstrates that they have been impacted internally by $\nu\acute{o}\mu\omicron\varsigma$.²⁰

¹⁹ The chiasm of 2:6–11 and the poetic parallelism of 2:12 are excellent examples of Paul’s ability as a letter writer. Paul’s use of $\gamma\acute{\alpha}\rho$ is frequent (144x in Romans alone), flexible, and capable of reaching back further than the previous clause (consider $\gamma\acute{\alpha}\rho$ in 2:11 or in 7:14 as examples). Das presents a similar structure and suggests that there is actually an additional chiasm in 2:12–14 in which 2:12a corresponds to 2:14, while 2:12b corresponds to 2:13 (*Paul, the Law*, 181).

²⁰ Rightly, Schreiner, *Law and Its Fulfillment*, 196; and Thomas H. Tobin, *Paul’s Rhetoric in Its Contexts: The Argument of Romans* (Grand Rapids: Baker, 2005), 115. Gathercole’s suggestion, however, that the significant point is that these Gentiles have any “excusing thoughts” is also plausible. “One point missed by commentators is the sting in the tail in the $\eta\ \kappa\alpha\iota$: the surprise for the Jewish interlocutor would have been that the thoughts *could actually provide a defence at all*. The point is often made by commentators that the $\eta\ \kappa\alpha\iota$ highlights the *rarity* of defence compared with accusation, but Paul’s rhetorical point in the diatribe consists in the surprising possibility of any *ἀπολογία*.” Gathercole, “A Law unto Themselves,” 46 (italics his).

IV. THE OPTIONS FOR EXPLAINING HOW THE LAW RELATES TO GENTILE CONDEMNATION IN ROM 2:12–16

Having established the context of 2:12–16 and having assessed the primary proposals concerning the identification of the Gentile doers of the law in 2:14–15, we are now in a position to examine the role the law of Moses does or does not play in the condemnation of Gentiles in 2:12–16. At least three different views could be held, and we will consider each in turn. First, Paul could be saying that the Mosaic law has no role at the judgment of Gentile sinners. Second, it could be argued that this passage simply does not define whether the Mosaic law will factor into the judgment of Gentile sinners. Or third, Paul may actually affirm that the Mosaic law will be part of the criteria used at the final judgment to bring about the righteous condemnation of Gentile sinners. Throughout this discussion, we also will consider how one’s position on the identity of the Gentiles in 2:14–15 relates to one’s view on the role of the Mosaic law at the final judgment.

1. *The law of Moses plays no role in the condemnation of Gentiles in Rom 2:12–16.* Since 2:12 contains strong parallelism, it is plausible that 2:12 explicitly affirms that the Mosaic law will not be used as a criterion for the judgment of Gentile sinners. Romans 2:12 could be read as follows: those who sin without the law will perish (be judged) without the law, and those who sin in the law will be *judged* by the law. This reading is one of Wright’s key arguments against those who hold that 2:14–15 concerns Gentile sinners rather than new covenant believers. Wright argues, “If those who are a ‘law to themselves,’ because ‘the law’ (presumably the Jewish law) is written on their hearts, are non-Christians, then Paul has been talking nonsense in v. 12 when he suggested that Gentiles, not having the law, would be judged without the law.”²¹

Wright’s view serves as a good example of how the text could be read if 2:14–15 concerns Gentile believers (Proposal #1). Paul affirms explicitly that the law of Moses plays no role at the judgment of Gentile unbelievers (2:12a). The rest of the passage concerns Gentile believers. Thus, this passage says nothing about the criteria that will be used at the judgment of Gentile sinners. It simply affirms that the Mosaic law will not be. One could argue that there is no need to offer such criteria here since Paul has already made it clear in 1:18–32 that Gentile sinners are accountable because they have failed to respond rightly to the God seen clearly through the creation of the world.

Interestingly, if 2:14–15 concerns Gentile sinners (Proposal #2), one could still argue that the law of Moses plays no role at the judgment of those sinners. In this case, the argument would read as follows. Paul affirms that the Mosaic law plays no role at the judgment of Gentile unbelievers (2:12a). In 2:14–15, Paul clarifies the criteria that will be used. The *Mosaic law* will not be used, but some other form of law will be (whether “natural law” or “God’s law” in general).²² In other

²¹ Wright, “The Law,” 146.

²² Moo writes that Paul qualifies 2:12 “by noting that Gentiles do, in a certain sense, have access to law. To be sure, they do not have *the* law—that is, the law of Moses, the Torah. But their frequent con-

words, Gentiles may not have any access to the law of Moses, but they do understand something about God's expectations; thus, they will be held accountable in accordance with this knowledge.

This perspective may seem attractive initially; in our view, however, it relies on a tenuous interpretation of νόμος in 2:15a. While Paul does play with the word νόμος in 2:14 when he says that “they are a law to themselves” [ἐαυτοῖς εἰσιν νόμος], the primary focus of 2:14–15 is still on the Mosaic law and the relative access people have to *that* law. Paul twice describes these Gentiles as people who do not have νόμος (the Mosaic law), yet they do things that νόμος (the Mosaic law) requires. Thus, they show that τὸ ἔργον τοῦ νόμου is written on their hearts. To read νόμου in this phrase as separate and distinct from the Mosaic law is problematic. Wright is correct that “the law” in this usage in 2:15a is *the Jewish law*.

In our estimation, if an interpreter (such as Wright) holds that 2:14–15 describes believing Gentiles, this first answer that the law of Moses plays no role in the judgment of Gentiles is plausible. If, however, an interpreter (such as Kuhr or Moo) holds that 2:14–15 describes unbelieving Gentiles, this first view seems unlikely.

2. *The role of the law of Moses in the condemnation of Gentiles is undefined in Rom 2:12–16.* A second path is also available for those who believe that 2:14–15 describes believers (Proposal #1). It is simply that this passage does not specify whether the Mosaic law will be part of the criteria used at the final judgment of Gentile sinners.

In our citation of Wright previously, he claims that Paul would be “talking nonsense” if 2:14–15 were about unbelievers since 2:12 states clearly that Gentile sinners will “be judged without the law” (Wright’s words). We would like to suggest, however, that this reading, which is adopted by many others, may *over-read* what 2:12a says.

Since 2:12 contains strong parallelism, it is easy to assume (perhaps prematurely) that the verbs “will perish” [ἀπολοῦνται] and “will be judged” [κριθήσονται]

formity to many of the requirements of that law (e.g. they do not murder, steal, or commit adultery) shows that they have a knowledge of God’s basic moral requirements—God’s ‘law’ in an extended sense” (Moo, *Romans* [NIVAC], 85–86, italics his). If this kind of reading is correct, it is possible that Philo may offer a parallel to Paul. Philo writes, “This world is a sort of large state, and has one constitution, and one law, and the word of nature enjoins what one ought to do, and forbids what one ought not to do” (*Jos.* 29). On this point, Tobin remarks, “When Paul uses the world ‘law’ (νόμος) in this section [2:14–15], he ultimately does mean the Mosaic law. But he understands the Mosaic law in a way similar to that found in some strands of Hellenistic Judaism. The law was explicitly revealed to Moses on Mount Sinai. But for Hellenistic Jews such as Philo of Alexandria, this same law was also reflected in the structure of the universe and was embedded in nature (φύσις) itself. For Philo, the world is in harmony with the Mosaic law, and the law with the world” (Tobin, *Paul’s Rhetoric*, 114). Likewise, Kuhr suggests that Paul, in Rom 2:14–15, parallels Philo in his appeal to natural law. The difference, however, is the way the authors use natural law in their respective arguments. Philo, for example, appeals to natural law to explain how the patriarchs could live pious lives. “Paulus dagegen bedient sich der gleichen Gedankengänge, um die Verantwortlichkeit der Heiden zu beweisen” (Kuhr, “Römer 2 14f,” 258). Explaining Paul’s view of the relationship of the Mosaic law to natural law or a universal moral law is beyond the scope of this article, but, for further discussion, see David VanDrunen, *Divine Covenants and Moral Order: A Biblical Theology of Natural Law* (Emory University Studies in Law and Religion; Grand Rapids: Eerdmans, 2014).

are identical (see Wright’s exchange of “perish” for “be judged” in his citation). The verbs certainly communicate similar ideas, namely, that all sinners face consequences. It is unclear, however, whether ἀπολοῦνται and κριθήσονται communicate the same idea. When Paul says that Gentile sinners *will perish* ἀνόμως, is this actually an affirmation that they *will be judged* ἀνόμως?

BDAG, for example, suggests the reading, “Those who sin without law will also be lost without law.”²³ It is difficult to argue from this assertion in 2:12a that Paul believes that νόμος will not play any role in the condemnation of Gentile sinners. Furthermore, what Paul says in 2:12a is not his emphasis, nor is it a point of tension between Paul and his Jewish counterpart. 2:12b is the emphasis and creates the tension. Those who sin ἐν νόμῳ will be judged διὰ νόμου. Both parties perish; sinful Jews end up just like sinful Gentiles; this is the disagreement. Thus, in our view, it would be safer to suggest that this passage does not clearly define the role the law of Moses plays at the final judgment of Gentile sinners.

3. *The Law does play a role in the condemnation of Gentiles in Rom 2:12–16.* The final option is that the law of Moses is part of the criteria that will be used at the final judgment of Gentile sinners. In our view, this reading offers the best explanation for what 2:12–15 says if 2:14–15 describes Gentile sinners (Proposal #2).

But how can Paul say that the ἄνομος perish ἀνόμως in 2:12a and then say in 2:14–15 that νόμος matters at their final judgment? Is this not the “nonsense” that Wright suggests it is? Would Paul not be contradicting himself in the same paragraph if 2:14–15 were about “law-less” Gentile sinners rather than new covenant Gentile believers?

At the outset, it should again be noted that Wright and others are correct that 2:14–15 does indeed focus on the Mosaic law and not some form of natural law or generic form of “God’s law” in contradistinction to the Mosaic law. Gentiles who do not have the Mosaic law sometimes do things required in the Mosaic law, demonstrating that at least some requirements of the Mosaic law are known internally. Thus, in our view, the answer to the “nonsense” objection is not to separate νόμος in the phrase τὰ τοῦ νόμου in 2:14 from νόμος in the phrase τὸ ἔργον τοῦ νόμου in 2:15.

The critical issue is rather what Paul does with the ἄνομος | ἐν νόμῳ dichotomy in 2:12. Romans 2:14–15 answers the questions raised by 2:12a concerning God’s judgment of the ἄνομος. Paul lays out the *criteria* for the judgment of Gentile sinners (τὸ ἔργον τοῦ νόμου and the conscience) and proves the *fairness* of that judgment: Gentile sinners are worthy of judgment since they have sufficient awareness of the law’s requirements.

When unbelieving Gentiles who do not have νόμος do things required by νόμος (e.g. pagans sometimes honor their mothers and are faithful to their spouses), these Gentiles who were not given the written νόμος are ἑαυτοῖς νόμος (2:14). These right actions demonstrate that τὸ ἔργον τοῦ νόμου is written on their hearts.

²³ BDAG 86.

Not only do Gentiles have τὸ ἔργον τοῦ νόμου in their hearts, however; they also have conscience [συνείδησις] as an additional witness to what is right and wrong. Thus, their thoughts accuse them (i.e. of violations of the requirements of νόμος) or even excuse them (i.e. because of obedience to νόμος in particular instances).

Paul's argument succeeds in answering the questions raised by 2:12a. He has explained the criteria for the judgment of the ἄνομος and has proven the fairness of that judgment by arguing (ironically) that *no one is truly ἄνομος*. All people are, to some degree, ἐν νόμῳ. Paul has clarified and reshaped the presupposed distinction of 2:12.²⁴ Every human is aware internally of the basic principles of νόμος because God has written them on the heart. Thus, people will be *spared* not on the basis of whether they *had* νόμος, but whether they *did* νόμος (2:12b–13); and people will be *condemned* not on the basis of whether they *had* νόμος (2:12a), but whether they *did* νόμος (2:14–15). Thus, Paul explains the criteria by which Gentile sinners will be judged and simultaneously undercuts the very ἄνομος | ἐν νόμῳ dichotomy upon which Jewish objections to 2:1–11 are based.

The final judgment of Jewish and Gentile sinners is distinct in that God takes into account the relative awareness each person has of the requirements of νόμος (2:12). However, the foundational standards to which people are held and by which people are judged are, in fact, the same—τὸ ἔργον τοῦ νόμου.²⁵ These requirements are etched upon the hearts of humanity, but expressed more clearly and explicitly in “the embodiment of knowledge and truth”—the written νόμος graciously given to the Jews.

Although Paul initially asserts a categorical distinction between how God will judge Jews and Gentiles in regard to νόμος (2:12), he hastens to minimize this very distinction (2:14–15). The degree to which νόμος functions as a criterion for judgment differs between Jews and Gentiles (2:12); but νόμος will nonetheless stand as a witness, alongside conscience, condemning both Jew and Gentile for failure to keep

²⁴ Dunn claims rightly that Rom 2:12 should be read as ethnic descriptions since Paul's argument “revolves wholly around the Jewish assumption that the law is a boundary which marks off those inside from those outside, and that this fact is decisive in the final judgment. Thus he starts with a distinction which he immediately questions (2:12)—the distinction between being “in/within the law” (ἐν νόμῳ) and “without/outside the law” (ἄνόμως), between those who have the law and those who do not have the law (2:14)” (James D. G. Dunn, *The New Perspective on Paul* [rev. ed.; Grand Rapids: Eerdmans, 2008], 165–66). We appreciate much of what Dunn is suggesting here and how he recognizes that Paul, in 2:14–15, challenges the initial distinction in 2:12. *At the future judgment*, there will be no “boundary markers,” since, even *in the present*, awareness of the requirements of νόμος is not exclusively a Jewish privilege.

²⁵ Wright recognizes that 2:14–15 indicates that νόμος will be used at the judgment of Gentiles, but, in his view, it will only be used at the judgment of Gentile *believers*. “The law sets the standard by which Israel will be judged; Gentiles will be judged without reference to it. However, there is one class of Gentiles who in a sense will be judged with reference to the Torah. This class consists of Gentile Christians; though by birth they do not possess the Torah, they are now in the strange position of ‘doing the law,’ since the Spirit has written the ‘work of Torah’ on their hearts” (Wright, “The Law,” 149). Das, however, is more likely correct when he notes, “All people, even Christians, will be judged according to the standard of the Mosaic Law according to Paul.... Both Jews (those ‘in the Law’) and Gentiles (those ‘apart from the Law’) will be impartially judged according to the standard of whether they have done what the Law requires (v. 12)” (*Paul and the Jews*, 181–82).

its righteous requirements, which were made known *explicitly* through the written νόμος, yet *sufficiently* through τὸ ἔργον τοῦ νόμου γραπτὸν ἐν ταῖς καρδίαις. God's judgment will be impartial, in accordance with works, based on truth, and relative to the knowledge one has had of νόμος.