Moses Has His Interpreters:
Understanding the Legal Exegesis in
Acts 15 from the Precedent in Jubilees

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Abstract: Acts 15 relates a council in Jerusalem discussing the legal status and requirements of gentiles who turn to Christianity. The resulting decree asserts that gentiles can be included as gentiles without adopting the status of a “convert” obligated to the complete laws from Sinai. They are still bound to the law of Moses, however, inasmuch as it specifies laws that are binding on gentiles. These laws are specified as four prohibitions: meat sacrificed to idols, blood, meat with blood in it, and illicit sex. In the absence of a pithy verse that neatly supports the point, the reason given is that this interpretation of Moses is widely taught in synagogues. The interpretation presented in Acts is evident first and foremost in the book of Jubilees, which rewrites the unconditional covenant of the rainbow in Genesis 9 into a conditional covenant binding on all gentiles, all of whom are descended from Noah. In addition to the fundamental concept of “Noachide laws,” Jubilees emphasizes as universally binding law the four issues presented in Acts 15. Although Jubilees itself was not a citable legal source for many in the first century C.E., the ideas developed in Jubilees influenced the legal interpretation of the narratives in Genesis.

Key Words: Acts 15 • Jubilees • Jerusalem council • Noachide laws • prohibition of eating blood • Leviticus 17-18 • gentile Christians • law of Moses

The prohibition of eating blood appears in Acts as one of four prohibitions from the law of Moses that are binding on gentile Christians. The prohibition—repeated three times in Acts (15:20, 29; 21:25) and commonly referred to as the “apostolic decree”—is central to the issues of the role of gentiles and the status of the law.1 In this article, I examine blood along with the three other prohibitions

1 Although the prohibition does not clearly appear in other NT books, one may well find the prohibition of eating blood reflected indirectly in some early justifications of the eucharistic practice
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binding on gentiles as an important example of how the law of Moses was interpreted, taught, and used for legal rulings in the first century. Scholars have had difficulty with the decree because the interpretation is not obvious from the Hebrew or Greek canonical texts, Philo, Josephus, or rabbinic literature. We shall see that the line of interpretation reflected in Acts is the line first elaborated in Jubilees. Namely, Acts follows Jubilees for three principles: (1) the narrative of Genesis 9 indicates that a set of laws is binding on all gentiles by virtue of their being descended from Noah; (2) the prohibition of eating blood in Genesis 9 includes related prohibitions expressed elsewhere in the law of Moses; (3) eating blood is a paradigmatic gentile offense linked to idolatry and illegitimate unions. We cannot be certain of the extent to which Jubilees developed these innovations or merely was the first work preserved for us to reflect them. Either way, Jubilees can help explain a difficult and important passage in Acts, and Acts can suggest how the interpretive traditions in Jubilees influenced communities like those reflected in Acts.

It is not the case that Jubilees was used directly or was included as Scripture in these communities, but Jubilees did influence “those who taught Moses in the synagogues in every town on every sabbath” (Acts 15:21). First I will review the passage in Acts in context, then consider the most salient scholarly discussions, and finally illustrate how Jubilees helps explain the interpretation in Acts.

I. Overview of the Issue in Acts 15

Acts 15 describes a discussion regarding the mission to gentiles, often called the “council of Jerusalem” leading to the so-called apostolic decree. The question at hand is what laws, if any, are binding on gentiles who become Christians. Three positions are expressed. The first view is that gentiles can be included as converts who take on many or all of the laws (Acts 15:5). The second view is that the spirit, grace, and faith suffice—apparently replacing the law—such that none of the laws are binding (Acts 15:7-12). The third view provides a middle path and is accepted. Gentiles are included as gentiles; they do not need to become Jews in order to be included. This view is defended from an adaptive quotation of Amos that may allude to other prophets (Acts 15:15-18). The question then becomes which laws are binding on gentiles. One answer might have been that the Jewish law is binding on Jews alone and not at all on gentiles. Acts, however, gives the answer found in Jubilees and rabbinic literature that Moses does indicate that some laws are binding on all nations. As we shall see, the implicit logic is not an argument from of consuming the blood of Christ. Thus, 1 Cor 10:16-21 reflects awareness of the view that consuming blood is related to demon worship (the view reflected in Jubilees) and argues that the same basic practice that is forbidden if directed to idols or demons is permitted if directed toward God. Note that Philo and Josephus present consuming blood as a matter of gluttony, so the view advanced by Jubilees cannot be dismissed as ubiquitous (Philo Spec. 4.122-123; Josephus A.J. 1.3.8 §102).
natural law but the interpretation of Noah’s covenant in Genesis 9 as binding on all his descendants and requiring proper handling of blood. The explicit argument in Acts is that the interpretation of Moses on the question at hand (What laws are binding on gentiles?) is widely known and cannot be ignored. It is a common understanding in the synagogues that Moses does include some laws for gentiles, so the decree must conform to that understanding or risk being perceived as a categorical rejection of Moses.

Mωυσῆς γὰρ ἐκ γενεῶν ἀρχαίων κατὰ πᾶλιν τοὺς κηρύσσοντας αὐτὸν ἔχει ἐν ταῖς συναγωγαῖς κατὰ πάν σάββατον ἀναγινωσκόμενος.

The reason being that Moses, read in the synagogues every sabbath from generations long past, in every city, has those who explain him. (Acts 15:21)

To disregard even Moses’ laws for gentiles would be to disregard Moses entirely, and to disregard the commonly taught and accepted interpretation would be equally perilous. The reference to the fact that Moses is not only read but explained may intentionally address the problem that the four prohibitions are not stated so explicitly and succinctly in the Pentateuch itself as they are given in Acts. The prohibitions are not a quotation from Moses, but from a widespread interpretation of Moses. Unlike anything in the Pentateuch, the decree itself is remarkably succinct.

ἀλλὰ ἐπιστεῖλαι αὐτοῖς τοῦ ἀπέχεσθαι τῶν ἀληθημάτων τῶν εἰδώλων καὶ τῆς πορνείας καὶ τοῦ πνικτοῦ καὶ τοῦ αἵματος.

But write to them to avoid the pollution of idols, illicit union, strangled things, and blood. (Acts 15:20)

The variants in Acts 15:29 and 21:25 vary the sequence and rephrase “the pollution of idols” as “things sacrificed to idols.” The relevant scholarly disputes about these prohibitions will be discussed below. For the overview, we can note that it is generally agreed that three of the four prohibitions pertain to eating, such that a reasonable translation would be “eating meat sacrificed to idols, eating strangled animals, and eating blood.” Thus, Acts 15 can be summarized as answering the question of the legal requirements of gentiles who turn to God by saying that their status remains as gentiles so they are responsible only for the laws that Moses (as interpreted) says are binding on gentiles. As we shall see, this interpretation of Moses is that Noah made a covenant that is binding on all Noah’s descendants and includes laws not explicit in Genesis 9.

2 Philip Maertens argues that there is a figurative sense to “strangled things,” implying that gentiles who turn to God should avoid harassment of humans (“Quelques notes sur PNIKTOS,” NTS 45 [1999] 493-96), but the literal sense still seems to refer to strangled (or stewed whole) animals.
II. Four Scholarly Approaches

Scholars have taken one of four basic approaches to explain the four prohibitions and why these four, and only these four, are required for gentiles who turn to God.³ The first approach, that the prohibitions are all related to idolatry, touches on an important theme in the background but is not sufficient to explain why these four are specified as binding on gentiles. The second approach, that the prohibitions are derived from Leviticus 17–18, is also revealing but similarly inadequate. The third approach, that the prohibitions are a specific subset of the laws required of resident aliens, is thoroughly misleading. The fourth approach, that the prohibitions are an interpretation of the Noachide laws, is on the right track but has failed to gain widespread acceptance inasmuch as Acts has been compared to the rabbinic formulations of the concept rather than the earlier development in Jubilees.

The first approach identifies all four prohibitions as related to idolatry or demons in some way. Idolatry is clearly relevant, since it is one of the four prohibitions mentioned, but the problem is in arguing that the other three are specific corollaries of the first. The structure is of four parallel prohibitions, not one category and three implications. Acts 15:21 indicates that the prohibitions come from Moses, and Moses does not say that the other three prohibited things are prohibited only in the context of idolatry.⁴ The broader suggestion that all four are in some sense demonic intersects with the background of the explanation but is not sufficient.⁵ Jubilees and its sources linked idolatry to demon worship (Jub. 1:11; 22:17-18).⁶ Jubilees linked eating blood to demon worship.⁷ At one point, eating over


⁵ This view is particularly developed by Wedderburn, “‘Apostolic Decree,’” 362-89.


⁷ See below on Jub. 7:27.
blood may have been linked to communal meals with the dead or underworld gods. To varying degrees, blood rituals, strangled animals, and cultic prostitution may have been part of the realia of worship in the ancient world, although we should not assume that every practice recorded was part of the daily experience of the communities reflected in Acts. Speaking generally, it is possible to think in demonological terms of the background of the prohibitions, at least in that violating God's law is inherently demonic. The inadequacy of the demonological explanation is its failure to account for the passage in Acts. The question discussed in the passage is not how one should deter demons but what laws are binding on gentiles. The fear of the demonic might serve as the anthropological or psychological background of the prohibitions, but Acts is explicitly concerned with legal exegesis. In particular, Acts is engaging in the kind of legal exegesis we see generally in rabbinic literature and particularly in Jubilees.

One variation of the "social issues related to idolatry" explanation is that the four prohibitions constitute baseline requirements of gentile Christians in order to maintain table fellowship with Jewish Christians. The argument is mostly a priori: if Acts reflects the practical concerns of communities of Christians including both Jews and gentiles, they must have had some basic understanding or standards guiding common meals. The text, however, does not indicate that table fellowship is the question at hand, nor do the four prohibitions adequately address table fellowship. Three of the four prohibitions can be understood as dietary, but one would have to argue that illicit sex is related to table fellowship because this sort of scandal in particular creates social awkwardness. The three prohibitions that can be called dietary give a poor survey of Jewish dietary laws. It has been argued that pork and other unclean animals are not mentioned because these prohibitions would have been obvious. Yet the prohibitions of idolatry and illicit sex are at least as obvious as lists of unclean animals. Furthermore, the explicit context of the question (what laws are binding on gentiles?), the answer (these four), and the reason (Moses is interpreted in the synagogues) suggests a more fundamental explanation.


10 Most recently, Oliver, Torah Praxis, 397.
question of legal status than practical advice for diplomatic menu planning in an

The second approach identifies all four prohibitions as derivative of Leviticus 17-18.\footnote{This position remains widely accepted in some form, although the challenge presented by S. G. Wilson (Luke and the Law [SNTSMS 50; Cambridge: Cambridge University Press, 1983] 84-88) spurred various attempts at revision or refinement (discussed below).} Here the key distinction is between observing that the four prohibitions are found in those two chapters, and concluding that Leviticus 17-18 is the sole or primary source of the legal exegesis.\footnote{Bauckham in particular seems to have mistaken the scholarly observation that the general themes of the four prohibitions can be found clustered in these two chapters for a requirement that Acts must be understood as an interpretation of Leviticus 17-18. Thus he claims, “The prohibitions in the Apostolic Decree should not be related to the later rabbinic concept of the seven Noachic commandments which are binding on all descendants of Noah (including the resident alien), since although these overlap with the prohibitions of the Apostolic Decree, they are not based specifically on Leviticus 17-18” (“James and the Gentiles,” 174). The similarity between Acts 15 and Leviticus 17-18 is likewise no more than an overlap in prohibitions, and there is no requirement that the prohibitions in Acts have to be based on Leviticus.}

Leviticus 17-18, the opening of the Holiness Code, is a relatively distilled concentration of fundamental laws that also appear elsewhere. It need not be dismissed as a coincidence that Acts resembles the Holiness Code if they share similar concerns. One might even add that a later variant in Acts, including a negative form of the golden rule, follows the same logic as the next chapter of the Holiness Code commanding love of neighbor as self: The inadequacy of explaining Acts 15:20 in terms of Leviticus 17-18, however, is that there is no explanation of why these two chapters were selected to answer the question in Acts of what laws are binding on gentiles. It should be added that the four prohibitions can be understood as overlapping with Leviticus in general themes, but there is no verbal correlation to suggest a direct allusion.\footnote{Bauckham claims that the order is the same (“James and the Jerusalem Church,” 459; idem, “James and the Gentiles,” 173), but this is misleading because the order varies in Acts and Bauckham selects the variant that suits his point.} The prohibition of the pollution of idols (or meat sacrificed to idols) relates to, but does not specifically allude to, the commandment to bring sacrifices to the sanctuary (Lev 17:3-5).\footnote{Peterson rejects the relationship between Lev 17:3-5 and the pollution of idols and generally dismisses the relationship of Leviticus 17-18 to Acts 15:20 (Acts of the Apostles, 435).} The prohibition of illicit union can similarly be related thematically to Leviticus 18 overall, but, interestingly, the term “illicit sex” (παρνηπρονεία) does...
not appear in Leviticus 18. The negative prohibition of “strangled things” can be understood as a succinct paraphrase of the positive commandment to pour out the blood of hunted animals.16 Yet the paraphrase is so loose that we cannot say that it necessarily comes from Lev 17:13 (“cover it with dirt”) rather than Deut 12:24 (“pour it out like water”). Thus, the only verbatim correlation is the one word, “blood.” The prohibition of eating blood appears in many passages, not only Leviticus 17. The context more important for the question of laws binding on all humanity is Genesis 9 (interpreted as a covenantal obligation as in Jubilees, which is not the case in the simple sense of Genesis).

The third scholarly approach focuses on the legal distinction of the “resident alien” (Ἱποταμός) in the law of Moses, or some qualified subset of the laws binding on resident aliens. This approach attempts to explain why Leviticus 17–18, out of all the laws of Moses, and why these four, out of all the laws in Leviticus 17–18, would be singled out for gentiles who turn to God. It can be acknowledged why this approach is attractive. The “resident alien” forms a category between Israelite and foreigner that assumes a close relationship and shared participation in many activities, but apparently not the full range of legal requirements, including circumcision. For scholars working backwards from Acts and trying to find a feature that the four prohibitions share in Leviticus 17–18, the category of “resident alien” could be tempting as moving toward an explanation of narrowing down the laws. Indeed, it can be admitted that the position “gentile followers of Jesus have the legal status of resident aliens” must have been considered in the early Jesus movement. Yet the problems with explaining Acts 15:20 as a qualified subset of the laws pertaining to resident aliens are numerous and deep, starting with the basic problem that Acts 15 is trying to say the exact opposite. Acts 15 rejects the view that gentiles who turn to God have the legal status of resident aliens in favor of the contrary view that gentiles who turn to God have the legal status of gentiles. Even among scholars who rightly observe the argument in Acts that gentiles are

16 This point was most clearly made by Bauckham (“James and the Jerusalem Church,” 459; “James and the Gentiles,” 173). The laws related to the animal that died of itself (ירילה) seem not to be the issue, contra Barrett (Critical and Exegetical Commentary on Acts, 734). More recently the association between an animal that died of itself in Lev 17:15 and strangled meat in Acts 15:20 has been argued by Oliver (Torah Praxis, 380-90). The concepts are related enough that it should come as no surprise that both terms may be used in lengthy discussions in Philo (Spec. 4) and the Pseudo-Clementine Homilies, but semantic proximity does not indicate that the ruling in Acts 15:20 relies on Lev 17:15. The problem is not that the vocabulary does not overlap between Leviticus and Acts, or that the meanings are different (killing vs. natural death). The problem with linking the prohibition of strangled meat in Acts to resident alien laws in Leviticus 17 is that resident aliens are not prohibited from eating יילה in Leviticus 17. There eating the meat is merely a source of ritual impurity; elsewhere the meat is prohibited only for priests (Lev 22:8) and explicitly permitted to resident aliens (Deut 14:21). Despite any practical resemblance, there is an important legal distinction between the commandment to drain blood of a hunted animal (Lev 17:13) and the purification requirement of one who eats from an animal that died of itself (Lev 17:15).
included as gentiles, there has been a failure to recognize that the legal statuses “gentile” and “resident alien” are mutually exclusive. This is true in Hebrew, and poignantly true in Greek. Hebrew distinguishes resident aliens and foreigners, and the classical sense of “resident alien” would not apply to gentiles living in Antioch. The Greek word used in the Septuagint to render “resident alien” (πρόσελήνυτος) is the word from which English derives “proselyte.” It is true that first-century Judaism had different ideas and categories for how gentiles might adopt a close relationship to the synagogue, but any understanding of the Greek word πρόσελήνυτος would have involved some sense of conversion and adoption of more of the law of Moses than only the four prohibitions already binding on them as gentiles. Yet it is clear from Acts that gentiles are included as gentiles, not as converts to Judaism in any sense, and the four laws required of them are the four laws that Moses’ interpreters have said are binding on gentiles.

Terrance Callan and Richard Bauckham have proposed elaborate solutions to the problem that the laws of the resident alien in the law of Moses do not match the four laws required of gentiles in Acts 15. The four prohibitions in Acts do fall within the category of laws binding on resident aliens, but there are many more than four laws explicitly binding on resident aliens. Furthermore, there are passages that suggest that all the laws apply to the resident aliens even if not individually so specified, “You shall have one law for both resident alien and citizen” (Lev 24:22; likewise Num 15:15-16; Deut 29:10-11; 31:12). Callan and Bauckham both look for subsets within the laws of the resident alien that match the prohibitions of

17 Bockmuehl correctly identifies the question as whether gentile Christians have the status of Noachides or proselytes and correctly identifies the answer as that they have the status of Noachides (“Noachide Commandments,” 93-94). He proceeds, however, to say that the laws for resident aliens apply to them. Bockmuehl is correct that “[i]f Gentiles are saved as Gentiles, they should be exhorted to keep those commandments which already apply to them” (ibid., 95). It is important to note that the laws that already apply to them are the Noachide laws, which are different from the laws for resident aliens (or any subset thereof). Bauckham also correctly identifies the issue and the point in Acts that gentiles are included as gentiles (“James and the Jerusalem Church,” 452, 58; “James and the Gentiles,” 167, 79), but he still identifies the laws applicable to gentiles as a subset of the laws applicable to resident aliens. Bauckham recognizes that his argument does not work in Greek (“James and the Jerusalem Church,” 462; “James and the Gentiles,” 177), but I argue below that it does not work in Hebrew either.

18 It may be added that in Rabbinic Hebrew devevelops the meaning of “convert” in the sense of keeping all the laws, including circumcision.

19 Terrance Callan discusses different variations and understandings of “proselyte” (“The Background of the Apostolic Decree [Acts 15:20, 29; 12:25],” CBQ 55 [1993] 284-97, here 290-95). Bauckham recognizes the problem and takes it as an indication that the original logic was based on Hebrew, not Greek, “But the point of the apostolic decree is precisely that Gentile Christians are not required to become proselytes, who would be obliged to keep the whole Law” (“James and the Jerusalem Church,” 462 n. 41). The problem, however, does not go away in Hebrew. In the Hebrew Bible and in Rabbinic Hebrew the must keep many or all of the laws. There is no evidence that a bilingual first-century Jerusalemite would have sharply distinguished a from a προσελήνυτος.
Acts 15:20, and both come up with rather implausible distinctions. Callan’s method is relatively straightforward. He lists all the laws that apply to resident aliens and looks for philological features that distinguish the four reflected in Acts. He concludes that all the laws that begin with the formula “anyone” (וָיֵא שְׁמָא) and bear the penalty of excision (הֵרֵם), and only those laws, are applied to gentiles in Acts 15:20. It is true that this formula is somewhat distinctive to the Holiness Code and partially overlaps with the four prohibitions. As observed above, it is not entirely a coincidence that Acts and the Holiness Code overlap, but it is far from a direct dependence. Part of the difficulty is making the formula fit illicit sex. It is true that Leviticus 18 uses both “anyone” and “excise,” but not in proximity (Lev 18:6, 29). The deeper problem is that Callan’s attempt to work backwards does not explain the ancient interpretive logic. There is no reason for a first-century legal exegete to say that the laws binding on gentiles are the laws binding on resident aliens that happen to be formulated with the words “anyone” and “excise.” It is essentially an accident that this pattern can account for even three of the four.

Bauckham makes a much more thorough effort not only to find a pattern in those four but to justify the ancient interpretive reasoning that once existed before being abbreviated and lost. Bauckham’s position is that the ancient interpreter distinguished “resident aliens in your midst” from “resident aliens in your gates,” “resident aliens who reside with you,” “resident aliens who reside in your land,” “resident aliens who reside in Israel,” and the simple, “resident alien.” The laws for the “resident alien who resides in your midst,” unlike the others, have special eschatological significance. Bauckham imagines that this distinction originated in Jer 12:16, “And then, if they truly learn the ways of my people to swear by my name, ‘As the Lord lives!’ as they taught my people to swear by Ba’al, they will be built up in the midst of my people.” Bauckham asserts that Acts 15:16 alludes to this passage by adding the word “I will return” (ἀναστρέψω) in the adaptive quotation of Amos. The previous verse in Jeremiah includes the word “I will return” (וְיָשַׁנְתֶּם). The least among the problems is that Bauckham overstates how widely accepted it was in the first century to perform legal exegesis by tying together seemingly meaningless coincidences and distinctions in word choice. Perhaps it would stand in some rabbinic texts, but Bauckham’s assertion that such an extreme degree of gezerah shawah was “a well-recognized exegetical method” requires evidence more closely related to Acts before it can support such an elaborate argument. It is certainly less explicit than one would expect, leaving

22 Callan, “Apostolic Decree,” 288.
23 If this passage were decisive for Acts 15 one might expect “swearing by the name of God and not other gods” to appear among the requirements for gentiles who turn to God.
Bauckham to suggest that the text as we have it is abbreviated from a longer text (but still maintaining the slyly adapted citation of Amos).²⁵

A bigger problem that Bauckham does acknowledge is that the argument only works in Hebrew. In Hebrew, Jer 12:16 (“in the midst of my people,” בְּתֵרָם לְעַם) shares a word with selected laws in Leviticus (“the alien who resides in your midst,” נַעֲרֵי אֲשֶׁר לְגַזְר בְּלוּדָם), but in Greek ἐν μέσῳ τῶν λαοῦ μου (“in the midst of my people”) does not have the same resonance with τῶν προσελκύστων τῶν προσκειμένων ἐν οίμιν (“the aliens residing among you”). Furthermore, the LXX does not distinguish “in your midst” from “in your gates,” rendering both as ἐν σοί ἐν οίμιν (Exod 20:10; Lev 17:8, 10, 12, 13; Num 15:15, 16; Deut 5:14). Bauckham’s solution is to assert the historical accuracy of the “council of Jerusalem” at least in that a decree was composed by people in Jerusalem thinking in Hebrew. He reasonably enough accounts for the fact that the citation of Amos follows the LXX version by asserting that the exegetes knew both versions. He does not account for why Jews in Jerusalem would compose a document for gentiles in Antioch and elsewhere using logic that would not make sense in Greek.

The argument finally fails to account for the four prohibitions. Even if one overlooks the basic point that Acts is arguing against the view that gentiles can be included with the legal status of resident aliens, and even if one accepts the elaborate distinction of laws pertaining to resident aliens “in your midst” from all the other laws pertaining to resident aliens, one is left with more laws applying to resident aliens “in your midst” than the four that appear in Acts. Bauckham dismisses some of these as temple ritual laws, taking it as self-evident that the eschatological community to include gentiles would not include temple worship.²⁶ On that basis Bauckham implies that the commandment to sacrifice animals in God’s sanctuary is not a ritual law (Lev 17:8-9), while the prohibition of working on the Day of Atonement is a ritual law (Lev 16:29). One fatal verse seems to have been missed by Bauckham’s concordance entirely, “there will be one law for the native and the resident alien residing in your midst” (Exod 12:49).²⁷ The logic is strained even if we imagine a longer exegetical passage only dimly reflected in the text as we have it. The more complicated the argument becomes, the less it is plausible that the question “What laws are binding on gentiles?” would have been satisfactorily answered in such a way. A better solution will more efficiently match the logic given in Acts. The answer to the question of the legal requirements of gentiles can be found in Moses as widely interpreted at the time.

²⁵ Ibid., 462.
²⁶ Ibid., 461.
²⁷ Bauckham does not mention this verse one way or the other. One might wish to argue that only the immediately preceding law applies to the resident alien in your midst, but that would only create a bigger problem for Bauckham’s imagined logic behind Acts 15, “If a resident alien residing with you participates in the Passover for the LORD, all his males must be circumcised before he can draw near to participate and be like a citizen of the land” (Exod 12:48).
The fourth and final scholarly approach is on the right track in that it looks to the concept of "Noachide laws" to answer the question of what laws are binding on all gentiles as gentiles. Three stumbling blocks have prevented this approach from gaining widespread acceptance. First, scholars tend to dismiss the relationship if they look only for specific verbal parallels rather than underlying conceptual parallels. The fundamental concept that gentiles are legally responsible for a covenant made by Noah is clearly found in Jubilees and rabbinic literature (starting with t. Abod. Zar. 8). The difficulty of matching an identical list of four prohibitions does not detract from the fundamental concept. The rabbinic interpretation of "eating blood" as "eating a limb torn from a living animal" shows the creativity and tendency toward permissiveness among some rabbis, but they are clearly working with the same assumptions about Noachide laws. Similarly, the move found in Acts of summarizing the positive commandment to pour out the blood as a negative prohibition of eating strangled meat is verbally distinct from most Jewish sources (except Philo), but addresses the same concept. It may be conceded that Acts 15 does not allude to Noah as specifically as one might like, but it should also be noted that verbally and conceptually "the nations" are central to Acts 15, and the primary source in Moses on the nations is none other than the Noah cycle, including the "table of nations" (see esp. Gen 10:32).

The second stumbling block is that the rabbinic evidence is dismissed as "late." It has been argued that the rabbinic evidence may have originated only a few decades later than Acts, but Jubilees can be dated two and a half centuries earlier. Again, if we


31 The expectation of allusion to Noah rather than the nations is exemplified by Barrett, Critical and Exegetical Commentary on Acts, 2:734; idem, Shorter Commentary on Acts, 234.

32 Bockmuehl argues that the tradition in t. Abod. Zar. 8.4 originated in the early second
are looking for core concepts rather than lists, we can easily fill in the gaps for an idea first developed by the middle of the second century B.C.E. and widely assumed and taken in creative directions in the second century C.E. There is no chronological reason to doubt that in the first century C.E. the concept of Noachide laws would have made the "curriculum" of how Moses was taught in the synagogues on every Sabbath in every town (Acts 15:21). The third stumbling block has been the failure to consider appropriately the evidence from Jubilees. Somehow one verse from Jubilees made the list of what many scholars feel obliged to mention, but it is the wrong verse.\(^{33}\) The list of instructions in *Jub.* 7:20 is indeed an inadequate parallel, but the concept of laws and a covenant binding on all of Noah's descendants (that is, everyone including gentiles) appears rather in chap. 6.\(^{34}\) The covenant in *Jubilees* 6 and the core concept of sins punishable by flood are the places to look for the concept of Noachide laws assumed in Acts and the basic methods by which the four prohibitions are determined.

### III. Jubilees Explains the Interpretation Assumed in Acts

Careful consideration of *Jubilees* offers a better explanation of Acts 15, and Acts 15 can tell us about the influence of *Jubilees* and its ideas. We have seen that study of the LXX and the MT, even with some remarkable concordance work and creative efforts to see patterns, does not suffice to make clear how Moses was taught in the first century of our era. Philo and Josephus do not help on this occasion. Either because of their contexts or happenstance of interpretive preference, they develop "eating blood" as a matter of gluttony rather than a paradigmatic gentile sin (Philo *Spec.* 4.122-123; Josephus *A.J.* 1.3.8 §102). Rabbinic literature is useful and still understudied, but potentially confusing inasmuch as it reflects ideas that developed over the decades and centuries following the composition of the NT and often favors creativity over the core assumptions that would have been widespread in the first century. *Jubilees*, along with the Dead Sea Scrolls, helps fill in the gap between the canonical compositions and rabbinic literature. This is especially true if one is speaking of legal exegesis or the interpretation of Genesis. The point is not that *Jubilees* itself was legally authoritative for the communities

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\(^{34}\) Moreover, *Jub.* 7:20 is Noah's testimony, which is different from Noah's covenant. Testimony is not legally binding and enforceable on all generations, as is the covenant in *Jubilees* 6.
related to the composition of Acts. The point is that *Jubilees* tells us about a circle of ideas that influenced the way that Moses was read and explained. *Jubilees* scholars will argue about that circle of ideas: What ideas are original innovations in *Jubilees*? What ideas came from this or that unknown or barely known source? How were the ideas transmitted and with what assumptions about scriptural authority? In the middle of that circle of uncertainty, however, is a text—a long, well-preserved, coherent text. The following paragraphs will illustrate what that text tells us about the basic assumptions reflected in Acts 15 and the four particular prohibitions. Namely, the basic idea of Noachide laws and the four particular prohibitions reflect the innovations and emphases in *Jubilees*.

A. Noah and His Sons Made an Eternal Covenant with God

Acts 15 reflects the idea first attested in *Jubilees* that all gentiles are bound to covenantal obligations that originated between God and their ancestors shortly after the flood. The underlying problem behind this innovation in *Jubilees* is the need to balance God’s perfect justice (see esp. *Jub.* 5:13-18) with the idea that gentiles are subject to judgment.\(^{35}\) For Israelites, the covenant at Sinai clearly laid out the obligations, blessings, and curses by which Israelites could be judged. Despite many prophetic pronouncements against foreign nations, no clear covenantal standard of justice applied to gentiles. The book of *Jubilees*, completed roughly two decades after the rise of Antiochus Epiphanes, would not have been satisfied either with leaving gentiles outside of God’s jurisdiction or with compromising the justice of God’s inevitable judgment of the nations. For judgment to be completely fair, according to *Jubilees*, the offense must have violated a commandment that had been revealed and the offender must have been warned. The principle that the commandment must have been revealed before it can be enforced is particularly salient in the pre-Sinai narrative setting of most of *Jubilees* and helps explain why Reuben, for example, did not receive the full punishment for his offense (*Jub.* 33:15-16).\(^{36}\) The related principle, that the offender must be warned, can be found in Ezekiel 3 and 33, and is especially developed in *Jubilees*.\(^{37}\) The key concept in *Jubilees* of “testify/testimony” bears a central connotation of “warn/


warning”; James L. Kugel has even argued that the term should be translated as such. The driving concern in Jubilees is not to identify the minimum standards of gentile compliance with the law of Moses, but rather to establish a standard by which gentiles can and will be harshly judged. Nevertheless, the idea of universal law explicitly binding on gentiles with all the force of a covenant is first developed in Jubilees and reflected in Acts 15. Note that this approach to universal law is through an explicit covenant, not an unwritten or natural law embedded in creation.

Genesis 9 clearly provides a covenant for Noah and his descendants, but Jubilees has to modify it from an unconditional covenant made by God to a conditional covenant made by Noah. The basic structure of the post-flood narrative in Genesis is that Noah offers a sacrifice; God says (*in his heart*) that the earth will not be destroyed again; God then blesses Noah and family with fertility and permission to eat meat (not previously permitted, Gen 1:29), minus blood and humans; and only then does God mention a covenant. That covenant bears no conditions or curses, only the sign of the rainbow and the blessing not to flood the earth. Jubilees rewrites the entire narrative as a conditional covenant, complete with obligations, blessings, curses, and oaths. First, Jubilees rewrites God talking to Godself as the beginning of the covenant (Jub. 6:4). The blessing of fertility becomes a commandment to be fruitful, multiply, and become a blessing (Jub. 6:5). More importantly, the first qualification of the permission to eat meat becomes a commandment not to eat blood. Jubilees is particularly clever in modifying the qualification excluding human bloodshed into establishing eating blood as a capital offense. Whereas Genesis has two parallel qualifications both introduced with (*only*), Jubilees replaces the second with (*lest*), (kam ‘i-, “lest,” Jub. 6:7). This turns bloodshed from an independent prohibition into the penalty for eating blood.10


39 This is true for the MT. If the text of Genesis before Jubilees resembled the Samaritan text, then Jubilees provided “lest” where the “only” was implicit. The point remains the same. For more on the ancient texts of Gen 9:5 and their relationship to Jubilees, see J. T. A. G. M. van Ruiten, Primaeval History Interpreted: The Rewriting of Genesis 1–11 in the Book of Jubilees (JSJSup 66; Leiden: Brill, 2000) 235-38.

40 Jubilees covers its tracks in two ways. First, the altered word is preceded by the explanation from Lev 17:14, “for the life of all meat is its blood,” which sounds and is scriptural, but breaks the flow just before discordant alteration. Second, Jubilees replaces the requirement of blood (*from the hand of any animal*) with (*by human means*). This makes the logical shift from the prohibition of human bloodshed by any species to capital punishment enforced by human courts. Again, however, the shift is masked well because the very next phrase in Gen 9:5 is none
Only flesh that is with its spirit with the blood you are not to eat because the life of all that is flesh it is in the blood lest your blood in your life be required by the hand of all people from the hand of all people I will require the blood of people. (Jub. 6:7, very literal translation)

Thus, Jubilees provides not only an explicit commandment but a specific punishment, which is harsher than anything in its sources. It may follow, though not as explicitly, that the promise not to alter the seasonal patterns or flood the earth again becomes a conditional blessing rather than an unconditional promise (Jub. 6:4). The key addition by which Jubilees elevates the prohibition of eating blood from the limits of carnivorous consumption to universal law is with the specific language of covenant and oath.

Noah and his sons swore an oath not to consume any blood that was in any animate being. During this month he made a covenant before the Lord God forever throughout all the history of the earth. (Jub. 6:10; trans. VanderKam)43

This passage is also one among many that emphasize the eternality of the covenant. Perhaps the "commonsense" problem with establishing universal law through ancestral obligation would have been that the function of warning would have been lost if the obligation was forgotten. The core idea that covenants can be binding on descendants was common, however, and explicitly provided by Gen 9:9.44 Jubilees adds to this the even more direct formula, "This law has no temporal limits because it is forever" (Jub. 6:14).

Acts 15 follows Jubilees for the basic idea that the law of Moses specifies covenantal obligations binding on all nations. The discussion there concerns the legal requirements of gentiles. The first rejected position is that gentiles as gentiles cannot be saved; only gentiles who become converts can be saved. The next question is whether any laws are binding on gentiles. The position that no laws are other than "from the hand of a person". The asterisk indicates that the Hebrew of Jubilees is reconstructed from the Ethiopic for these words. See further Hanneken, "Sin of the Gentiles," 16-18.

41 The prohibition or accusation of eating blood generally carries no explicit punishment, except in Leviticus where the penalty is מַרְכָּא ("excision"). Execution by human courts is more severe than the divinely enforced punishment of excision. See Jacob Milgrom, Leviticus 1–16: A New Translation with Introduction and Commentary (AB 3; New York: Doubleday, 1991) 457-60.


44 For a Neo-Assyrian vassal treaty from 672 B.C.E. binding on descendants, see Bernard M. Levinson, Legal Revision and Religious Renewal in Ancient Israel (Cambridge: Cambridge University Press, 2008) 53.
required would have amounted to a claim that Moses and the covenants described therein can be disregarded. That position is rejected in favor of the position that the law remains binding and gentiles continue to be legally responsible for the covenant that Moses describes their ancestors having made in the days of Noah. That legal compliance, along with the spirit, grace, and faith, allows them to be saved.

B. The Prohibition of Eating Blood

In addition to the core concept of Noachide laws, the four specific prohibitions listed in Acts correlate with emphases in Jubilees. First, the prohibition of eating blood in Acts 15:20 follows easily from Genesis 9 once the basic premise of Noachide laws is established. It can be added, however, that Jubilees stands out in emphasizing this particular issue. In fact, the only Second Temple source that comes close to Jubilees for expanding on the prohibition of eating blood beyond rephrasing the Pentateuch is the Damascus Document, which depends directly on Jubilees.\(^\text{45}\) Jubilees dwells on eating blood as a paradigmatic gentile offense, both in the context of the etiology of the nations following the flood and in the context of Abraham's separation from gentiles.\(^\text{46}\) The issue is repeated in sixteen different verses across four chapters (Jub. 6:7, 10, 12, 13, 18, 38; 7:28, 29, 30, 31, 32; 11:2; 21:6, 18), not including the related issue of covering blood with dirt (7:30; 21:17). Jubilees stands out not only for establishing the idea that Genesis 9 creates the foundation for universal law, but for emphasizing the prohibition of eating blood as a major issue. The clarity of this point also serves to anchor the other prohibitions in the Noachide covenant by association.

C. The Prohibition of Strangled Meat

Genesis 9 does not prohibit strangled meat, nor does it say any more about what should be done with blood other than not to eat it. In order to understand the meaning of πνικτός ("strangled [meat]"), we need to consider related blood laws in Leviticus and Deuteronomy. There the prohibition of "eating blood" appears along with a positive commandment to pour out the blood (Lev 17:13; Deut 12:16, 24; 15:23). This positive commandment could itself be rephrased as a negative prohibition of eating meat the blood of which has not been properly drained, which could be slightly different from eating blood directly. The Damascus Document reflects this interpretation in the prohibition of eating fish that is "strangled" in the

\(^{45}\) Expansion of the prohibition of eating blood appears in CD 3.4-7 and 14.13-14. The clearest evidence of dependence on Jubilees is CD 16.

sense of left to asphyxiate out of water, “They shall not eat fish unless they are split while alive and their blood drained” (CD 14.13-14). Philo uses another term for “strangled” to describe what is prohibited in the commandment to drain blood from hunted animals, “strangling and choking” ἄγχοντες καὶ ἀποπνίγοντες (Spec. 4.122). The Greek word in Acts, πνικτός, covers the basic premise of meat the blood of which has not been drained, so we need not worry whether the primary image was “strangled” or “stewed whole.”

The missing logic is how commandments to Israelites in Leviticus and Deuteronomy apply to gentiles. One fundamental principle that Jubilees exemplifies but did not innovate is the principle of metonymy, such that inclusion of one law serves to include the set of related laws expanded elsewhere. Jubilees exemplifies this by inserting the explanation from Lev 17:14 into its rewriting of Gen 9:4 in Jub. 6:7. Jubilees goes so far as to suggest that Noah’s expertise on blood extends beyond the three verses expressed in Genesis; he wrote a book on the subject, which includes the laws related to blood given to the Israelites in Leviticus (Jub. 7:28-33; 21:10). It is possible that an actual book of Noah existed before Jubilees, or that Jubilees borrowed the idea from Aramaic Levi Document.

οὕτως γὰρ μοι ἔνετειλατο ὁ πατήρ μου Ἀβραάμ, ὅτι οὕτως εὐθεν ἐν τῇ γραφῇ τῆς βίβλου τοῦ Ναοί περὶ τοῦ αἵματος.

For thus my father Abraham ordered me, because thus he found in the writing of the book of Noah concerning the blood. (Aramaic Levi 57)

Jubilees presumably adopted the idea that Noah wrote a book concerning blood that includes not only “don’t eat it” but also the commandments summarized by the prohibition of eating strangled meat. The Aramaic Levi Document, however, presents the laws concerning blood as priestly practice, not universal law. In the passage cited, Isaac instructs Levi about sacrificial practice with reference to someone else who makes a pleasing sacrifice to the Lord, Noah. The role of Noah as arch-priest is very different from the role of Noah as patriarch of the gentiles. Jubilees takes Noah’s laws concerning blood in their fuller form known from Sinai


48 Jubilees traces at length the history of Noah’s books and their transmission to the Levites. Noah wrote books and transmitted them to Shem (Jub. 10:13-14). They ended up in the hands of Abraham (Jub. 12:27), who shared them with Isaac and Jacob (Jub. 21:10), who gave them to Levi “so that he could preserve them and renew them for his sons until today” (Jub. 45:16).

49 For a fair discussion of the possibility that a single coherent document stands behind all the allusions to Noachic writings, see Michael E. Stone, Aryey Amihay, and Vered Hillel, eds., Noah and His Book(s) (SBEJL 28; Atlanta: Society of Biblical Literature, 2010). Some Aramaic fragments of the Levi Document predate Jubilees, but the passage quoted is preserved only much later than Jubilees, in Greek.

and reads them back into ancestral times not as priestly instruction but as part of the covenant binding on all nations. When Acts 15 reads universal law from Genesis 9 to include the related commandments in Leviticus 17 and Deuteronomy 12 it follows the precedent of *Jubilees* in reading laws from Sinai as implicit in the narratives of Genesis in general and reading them into a universal covenant made through Noah in particular.

**D. The Prohibition of Idolatry**

As we turn to the prohibitions of idolatry and illicit unions, we face the problem of an overabundance of explanations and the difficulty of narrowing down one central argument. Some readers may wish to treat these as common sense or obvious based on the cumulative emphases of Israelite and Jewish ethics. Others may be content that the link between consuming blood and idolatry was part of everyday experience in the ancient Mediterranean. In the spirit of analyzing Acts 15:20 as legal exegesis of the Noachide covenant, specific links to the Noah cycle will be suggested. A straightforward possibility for the logic for the prohibition of idolatry from Noah’s covenant would be to take Noah’s sacrifice, which was pleasing to the Lord, as an essential part of the covenant. Thus, it can be taken as implicit that sacrifices not pleasing to the Lord, elsewhere defined as idolatrous sacrifices, are prohibited under the terms of the covenant. While the condemnation of idolatry is too widespread to be traceable, if the question is specifically the link between idolatry and the violation of the covenant of Noah, the earliest evidence is *Jubilees*. *Jubilees* creates a system of gentile sin that links eating blood and idolatry. Genesis provides no etiology of idolatry and only casually mentions in the Jacob cycle the existence of “household gods” (Gen 31:19). Joshua implies that Abram was born into an idolatrous family (Josh 24:2). The sources may suggest that idolatry developed sometime between the righteous Noah and the idolatrous Terah, but only *Jubilees* provides an etiology of idolatry that links it to eating blood. Both are the result of demons leading gentiles astray.

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51 Bauckham (“James and the Jerusalem Church,” 454-55; “James and the Gentiles,” 164-65) suggests that the adaptive quotation of Amos in Acts 15 deliberately alludes to Isa 45:21 by adding the words “known from long ago” (γνωστὰ ἀπ’ αἰῶνος), which resembles the Hebrew text “who declared this previously?” (מי נחשמה לך ממקושך) more than anything in Amos. If this is the case, the context of Isaiah would suggest that abandoning idols should go without saying for nations that drew near to God. This would require mixing of two points in Acts 15, the case for gentiles being included as gentiles according to “the words of the prophets” (οἱ λόγοι τῶν προφητῶν, Acts 15:15), and the case for the four prohibitions “on account of Moses” (Μωσῆς γὰρ, Acts 15:21).

During this jubilee Noah's children began to ... shed human blood on the earth, to consume blood. ... They made molten images for themselves. Each one would worship the idol which he had made as his own molten image. They began to make statues, images, and unclean things; the spirits of the savage ones were helping and misleading (them) so that they would commit sins, impurities, and transgression. (Jub. 11:2, 4; trans. VanderKam)

The same explanation appears in Noah's instructions, “For I myself see that the demons have begun to lead you and your children astray; and now I fear regarding you that after I have died you will shed human blood on the earth and ... consume the blood” (Jub. 7:27-28). The association appears in other passages that seem to equate idolatry and eating blood as fundamental sins of gentiles, the rejection of which characterizes Abraham.

Now you, my son, keep his commandments, ordinances, and verdicts. Do not pursue unclean things, statues, or molten images. Do not eat any blood of an animal, cattle, or of any bird that flies in the sky. (Jub. 21:5-6; trans. VanderKam)

Although many passages suggest that idolatry is foolish even for gentiles, *Jubilees* stands out as a source for the idea that it violates a covenantal obligation binding on gentiles through its association with eating blood. The point is certainly not that the early church would have condoned idolatry if not for *Jubilees*. Acts 15:20-21, however, can be best understood not just as wise advice but as legal exegesis. As a matter of legal exegesis of Genesis, *Jubilees* has a special role, centuries before Acts and rabbinic literature.

**E. The Prohibition of Illicit Sex**

Similarly, one might take the prohibition of illicit sex as common sense based on Israelite and Jewish ethics. Again, however, the prohibition of illicit sex can be understood as universally binding based on the Noah cycle. One approach is to link the sin of Ham in seeing Noah's nakedness (Gen 9:22) to all the other prohibitions of uncovering nakedness particularly in Leviticus 18 and 20, which might be generalized as “illicit sex.” The responses of Ham’s brothers and father indicate that the prohibition was binding already in primordial times. *Jubilees* again provides reasoning rooted in legal exegesis. Recall that the question is what are the offenses for which all humans, not just Israelites, are legally responsible. The basis for exegesis here is not Genesis 9 but Genesis 6. Genesis is notoriously vague about the kind of wickedness that warranted the flood, a particularly extreme form of capital punishment. The Book of the Watchers had linked the flood to Gen 6:1, the sons of God who took human daughters as wives. The Book of the Watchers, however, presented the offense as willful rebellion against God (*1 Enoch* 6:3) and illicit teaching (*1 Enoch* 8). *Jubilees* conspicuously retells the story as a paradigmatic
testimony of why intermarriage, its ultimate example of illicit sex, is a terrible evil (Jubilees 5; 30:10-16).\textsuperscript{53} Jubilees explicitly states that illicit sex is one of the three reasons for the flood (along with uncleanness and injustice, Jub. 7:20-21). Thus, the prohibition of illicit sex was clearly binding and a capital offense in the days of the flood, long before Sinai, and applies to all nations.

IV. Conclusion

The claim here is not that Jubilees was authoritative for the communities behind Acts. The source is Moses, but it is Moses as read by Jubilees and interpreters following the same line of interpretation. Acts 15:21 indicates that the authority was not a quotable verse from the Pentateuch but popular interpretation:

The reason being that Moses, read in the synagogues every sabbath from generations long past, in every city, has those who explain him. (Acts 15:21)

When people in the synagogues every Sabbath asked why the earth was flooded or what laws are binding on gentiles, the pre-Abraham stories in Genesis would necessarily have been part of the answer. Since Genesis alone does not make the answers clear, those who taught the law of Moses would have relied on interpretive traditions directly or indirectly related to Jubilees. Either way, Jubilees is the earliest document preserved for us that explains the principles and particulars of this line of legal exegesis. Illicit sex, idolatry, eating blood, and eating meat with blood in it are the primordial offenses that everyone descended from Noah (that is, everyone) is legally responsible for avoiding. Even though Moses does not say so in a form that can be succinctly quoted, the interpretation in Acts 15 assumes that a wide audience aware of current interpretations of Moses would find these four universal laws implicit in Genesis, as first explicated by Jubilees. It is sensible that a first-century Jewish legal ruling would be based on Moses, and sensible that a legal ruling concerning gentiles would be based on the Noah cycle, and sensible that the legal interpretation of the Noah cycle would be based, indirectly if not directly, on the principal ancient example of legal interpretation of Genesis, the book of Jubilees.

Thus, reading Acts 15 as legal exegesis in light of Jubilees tells us about Acts, and it tells us about the influence of Jubilees. This approach does not address every

\textsuperscript{53} Reed ("Enochic and Mosaic Traditions," 360-61; eadem, Fallen Angels and the History of Judaism and Christianity: The Reception of Enochic Literature [New York: Cambridge University Press, 2005] 91-92), building on Betsy Halpern-Amaru (The Empowerment of Women in the Book of Jubilees [JSJSup 60; Leiden: Brill, 1999] 147-59), has shown that Jubilees generalizes from angelic intermarriage a paradigm for all intermarriage between Israelites and gentiles. The root תַּמָּן ("to have illicit sex, prostitute") first appears in Gen 34:31, which Jubilees rewrites as a paradigmatic testimony against intermarriage (Jub. 30:10-16).
argument about the historicity of the council and the relationship of Acts to Galatians. It does, however, explain the passage and in particular the relationship between v. 20 and v. 21. It also elucidates a view of the law as completely legitimate and binding, although applied differently to the descendants of those who made the covenant with Moses at Sinai and the descendants only of those who made the covenant with Noah at Ararat. What we learn about Jubilees is that, even though it never gained widespread authority as a citable source, the ideas that it preserved, innovated, and developed had widespread influence. Acts 15:21 may hardly be exaggerating that the manner in which the law of Moses was taught in the synagogue in every town on every Sabbath continues the way of reading Moses developed in Jubilees, particularly on matters of legal exegesis and interpretation of Genesis.

54 This point was made nicely by Bauckham: “To require of Gentile Christians obedience only to the four commandments which the Law itself imposes on them is not to set aside the authority of the Law but to uphold it” (“James and the Gentiles,” 179).