YESHIVAT HAR ETZION

ISRAEL KOSCHITZKY VIRTUAL BEIT MIDRASH (VBM)

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

**Before Sinai: Jewish Values and Jewish Law**

**By Rav Dr. Judah Goldberg**

For easy printing, see:

<http://vbm-torah.org/archive/sinai/24sinai.htm>

**Shiur #24: The Land of Israel (7): *Bikkurim* and *Berit Avot***

Over the last several *shiurim*, we have differentiated between the “sanctity of the soil” of the Land of Israel (category #5) and other dimensions of the Land, such as the “title” of the Land of Israel (categories #1-2) or the holiness of the Divine Presence (categories #3-4). The “sanctity of the soil,” as a technical, legal concept, we identified as a *berit Sinai*category, while the other conceptions of the land seem to be at least rooted in *berit Avot* (though the covenant of Sinai may add further layers to them).

 We have presumed throughout our discussion that the *mitzvot* that are specifically incumbent upon the produce of the Land of Israel are strictly a function of category #5. However, are there any exceptions? Might any of the classic agricultural *mitzvot* of the Land of Israel reflect a different aspect of the Land’s significance and heritage? In this *shiur* and the next, we will focus on the dual *mitzvot* of offering *bikkurim* (first fruit) and *mikra bikkurim* (reciting the accompanying text) for their possible connection to *berit Avot* and the “title” of the Land of Israel.

**Is *Bikkurim* a “Soil-Based” Mitzva?**

 From the words “that you harvest from your land” (*Devarim* 26:2), the Talmud (*Bava Batra* 81a) learns that *bikkurim* are only offered from the produce of the Land of Israel. While at first glance this would seem to confirm *bikkurim*’s identity as one of the “*mitzvot ha-teluyot ba-aretz*,” whose practice is confined to the Land of Israel, *Tosafot* note the peculiarity of this inference. After all, the Talmud does not provide similar proof texts with respect to *teruma*, tithes and other soil-based obligations. Rather, they all fall under the broad principle that “any mitzva that is tied to the land is practiced only in the Land [of Israel],” for which the Talmud provides a separate textual source (*Kiddushin* 36b). Why should *bikkurim* be any different?

 *Tosafot* quote a radical answer from R. Shimshon of Sens: Indeed, *bikkurim* should not be considered a soil-based mitzva at all! R. Shimshon observes that soil-based *mitzvot* share a common framework: The produce of the sanctified soil of the Land of Israel is naturally invested with a certain status that obligates it in particular *mitzvot*, such as the separation of *teruma* and tithes. As such, the produce is inherently forbidden for consumption until those *mitzvot* have been fulfilled. Furthermore, the obligation is driven by the produce itself, rather than by the people involved, which is why the obligation depends upon the Land’s fruits and grains reaching the status of “produce,” post-harvesting.

 The mitzva of *bikkurim* differs from soil-based obligations in all these respects. According to R. Shimshon, it is a “personal obligation, just like the obligation of *tzitzit*.” The farmer must descend into his field or orchard and designate *bikkurim* to be delivered to the Temple, but doing so is not demanded by an inherent state of the produce, nor does his action change its overall status. Similarly, the Torah can ask the farmer to designate *bikkurim* even before there is any genuine “produce”—while the fruits are still growing on the trees.

 Therefore, the confinement of *bikkurim* to the Land of Israel cannot be taken for granted. The mitzva is not necessarily tied to the sanctity of the soil, and therefore a farmer could have conceivably been asked to separate first fruits anywhere, until the Biblical text taught us otherwise. In other words, **the mitzva of** ***bikkurim* is not primarily a function of category #5, of the “sanctity of the soil.”**[[1]](#footnote-1) But then what aspect of the Land of Israel does *bikkurim* reflect?[[2]](#footnote-2)

**The “Land of Israel” for *Bikkurim***

 In earlier *shiurim*, we learned to appreciate different aspects of the Land of Israel from the fact that different laws apply within different boundaries. Conversely, we may be able to learn something about the nature of *bikkurim* and its relationship with the Land by examining the scope of the territory that is obligated in this mitzva. The Tannaitic literature offers multiple reasons for restricting the territory obligated in *bikkurim*. We will consider them one by one:

1. ***“Land Flowing with Milk and Honey”***

 If the offering of *bikkurim* is indeed similar to other soil-based obligations, then we would expect it to apply throughout the territory of category #5, which includes, according to most opinions, both sides of the Jordan. Indeed, this is the first opinion in *Bikkurim* 1:10. However, the *mishna* continues with the opinion of Rabbi Yosi Ha-Gelili: “We do not bring *bikkurim* from ‘across the Jordan,’ for it is not ‘land flowing with milk and honey,’” as *mikra bikkurim* refers to the Land of Israel (*Devarim* 26:9). Additionally, the *Sifrei* (on that verse), prior to quoting the opinion of Rabbi Yosi Ha-Gelili, learns from another verse (*Shemot* 13:5) that only the territory of five out of the seven Canaanite tribes is considered “flowing with milk and honey.” Therefore, according to this first opinion in the *Sifrei*, *bikkurim* can only be offered from this limited area.

 We can suggest two possible explanations for the limitation of *bikkurim* to the produce of “land flowing with milk and honey.” First, as *bikkurim* are supposed to represent the best of the Land of Israel,[[3]](#footnote-3) perhaps they must come from only its richest parts. In this case, the limitation relates more to the actual fruits than it does to the land. Land that is not flowing with milk and honey is technically worthy of sending *bikkurim* to the Temple, but its produce is not worthy of being offered.

Alternatively, we can understand the restriction of *bikkurim* to “land flowing with milk and honey” as a more fundamental statement about its nature. This phrase originally appears in God’s command to Moshe to lead the Jewish people out of Egypt to a “land flowing with milk and honey” (*Shemot* 3:8,17) and is frequently accompanied by some reference to *berit Avot*.[[4]](#footnote-4) In other words, the descriptor of “a land flowing with milk and honey” seems to represent God’s historical promise to deliver the Jewish people to the Land of Israel—that is, *berit Avot*.[[5]](#footnote-5)

If this phrase not only appears in the text that is recited upon offering *bikkurim* but also influences the very parameters of the mitzva,[[6]](#footnote-6) then perhaps it is telling us that *bikkurim* is first and foremost a reflection of *berit Avot*—specifically, its fulfillment. Indeed, this perspective on *bikkurim* is almost explicit in the first statement attributed to the bearer of first fruits: “I have declared today to Hashem, your God, that I have come to the land that God promised our forefathers to give us” (*Devarim* 26:3). As the Ramban explains:

“I have declared today”—with this fruit that I have brought, I have declared and thanked Hashem, your God that He has brought me “to the land [He] promised our forefathers to give us,” **and behold, God fulfills His word**, and I thank and praise His Name.[[7]](#footnote-7)

*Bikkurim* symbolizes the fulfillment of God’s promise to the *Avot* to deliver their progeny from bondage and to the Land of Israel. If so, the mitzva is fittingly restricted to the “land flowing with milk and honey” promised to the *Avot* (category #1), even though soil-based obligations can be extended by further conquest.[[8]](#footnote-8)

 A practical distinction between these two different explanations of *bikkurim*’s restriction to “land flowing with milk and honey” may be the actual scope of this territory. Regarding the *Sifrei* we cited earlier, the Ramban (*Shemot* 13:5) seems to understand that Rabbi Yosi Ha-Gelili is responding to the first opinion that limits *bikkurim* to the “land of five tribes.” In addition, Rabbi Yosi Ha-Gelili excludes territory east of the Jordan.[[9]](#footnote-9) The first opinion, then, while excluding the land of the remaining two Canaanite tribes, does not completely discount the territory east of the Jordan. Land east of the Jordan that was held by one of the five tribes and is “flowing with milk and honey” is in fact eligible for *bikkurim*. In that case, the condition of “land flowing with milk and honey” does not seem to describe a particular area, but rather is a necessary feature of the actual produce offered.[[10]](#footnote-10)

 The *mishna*’s discussion, on the other hand, makes no mention of the “land of the five tribes,” but simply quotes a dispute about the territory east of the Jordan. Rabbi Yosi Ha-Gelili excludes that territory, as it is not “flowing with milk and honey,” but presumably includes the entire historical Land of Canaan[[11]](#footnote-11); this is also the Rambam’s ruling (*Hilkhot* *Bikkurim* 2:1).[[12]](#footnote-12) Regarding the *Sifrei*’s contention that not the entire Land of Canaan is “flowing with milk and honey,” Rabbi Yosi Ha-Gelili might simply disagree. Alternatively, R. Menachem Ziemba suggests that Rabbi Yosi Ha-Gelili might agree but think it is sufficient that the Land of Canaan is, in the words of the *Yerushalmi* (*Bikkurim* 1:8), the land “that has in it [areas] flowing with milk and honey.”[[13]](#footnote-13) According to this characterization, R. Ziemba notes, “‘flowing with milk and honey’ is not a condition for *bikkurim*, but rather a sign of the land.” I would add that it is not just any sign, but a sign of the land that was promised to the *Avot*.[[14]](#footnote-14)

***2.* *The “Oath”***

The connection between the territory from which *bikkurim* is offered and *berit Avot* is most explicit in the *Mekhilta* (*Masekhta De-Pischa* 17). The *Mekhilta* also compares the Torah’s description of *bikkurim* in *Devarim* 26 to *Shemot* 13:5, not because of the common phrase of “flowing with milk and honey,” but because of the common mention of an “oath.” The bearer of first fruits announces that he has reached “the land that God swore to our forefathers to give us” (*Devarim* 26:3). From *Shemot* 13:5, the *Mekhilta* gleans more details about this sworn land: “the land of the Canaanites, the Hittites, the Amorites, the Hivvites and the Jebusites **that [God] swore to your forefathers to give you**.” God’s oath to our forefathers was made specifically about the historical Land of Canaan,[[15]](#footnote-15) and it is from this land alone that *bikkurim* are brought, as a symbol of God’s fulfillment of *berit Avot*.

***3.* *“That You, God, Gave Me”***

 Finally, we can return to the first opinion of the *mishna*, which maintains that *bikkurim* can be offered from both sides of the Jordan. Our initial assumption was that this opinion does not connect *bikkurim* to *berit Avot* but instead treats it as any other soil-based mitzva, which is practiced in all conquered lands. The Rambam, however, seems to offer a different approach: “Even though [the eastern bank of the Jordan] is not ‘flowing with milk and honey,’ behold, it, too, was given to us, and one can say ‘that You, God, gave me’ (*Devarim* 26:10)” (Commentary on *Bikkurim* 1:10). The Rambam is hinting at an alternative explanation for excluding the eastern bank of the Jordan that is quoted by the *Yerushalmi*: “‘That You gave me” (*Devarim* 26:10)—[but] “not that which I took for myself on my own.”[[16]](#footnote-16) To this, the Rambam explains, the first opinion in the *mishna* would respond that the eastern bank of the Jordan is also a Divine gift. Even though it was settled by the tribes of Reuven and Gad by their own initiative, they can also proudly refer to their inheritance as “the soil that You, God, gave me.”[[17]](#footnote-17)

 According to the Rambam, what are these two opinions arguing about? Perhaps everyone agrees that the mitzva of *bikkurim* must reflect *berit Avot*, but they disagree about exactly which aspect it reflects. Those who exclude the eastern bank of the Jordan believe that *bikkurim* narrowly reflects category #1—the land actually acquired and inhabited by the *Avot*. The opinion that includes the eastern bank believes that *bikkurim* reflects category #3—the expansive Land of Israel that was anticipated by *berit bein ha-betarim.* Even if some of the conquests were not Divinely commanded, one who reads Jewish history through the lens of *berit bein ha-betarim* can reasonably see all conquered lands as that which “You, God, gave me.”

**Summary**

In summary, different commentators treat restrictions on the territory obligated in *bikkurim* in different ways. Some, based on the Ramban’s approach, seem to view these restrictions more technically, in which case *bikkurim* may still in principle belong to the cluster of soil-based *mitzvot*. Others, however, such as the Rambam, draw boundaries that are more suggestive of a fundamentally different conception of the Land of Israel with regard to *bikkurim*. Of course, the divergent Tannaitic opinions we have seen may differ on exactly this issue, though the Rambam, at least, minimizes the gap between the two opinions in the *mishna*.

**Conclusion**

Finally, returning to the beginning of this *shiur*, we find that we have jumped from one extreme to the other regarding *bikkurim* and the Land of Israel. Our starting point was the Talmud’s consideration that *bikkurim* could apply universally. Our conclusion is that not only are *bikkurim* not offered from other lands, but they may be even more restricted within the Land of Israel than the traditional *“mitzvot ha-teluyot ba-aretz*”!

 What these two poles have in common is that they both remove *bikkurim* from the familiar group of soil-based *mitzvot* that strictly reflect category #5. If *bikkurim* are indeed only offered from the Land of Israel, perhaps it is because the mitzva is so closely tied to the story of our national heritage. The next *shiur* will further explore this idea by examining the recitation that accompanies the offering of the *bikkurim*.

**For Further Thought:**

1. This *shiur* analyzed the nature of *bikkurim* through the prism of their place of origin, concluding that they primarily reflect either category #1 (the land of the *Avot*) or category #3 (the political Land of Israel) of the Land. However, we can also analyze *bikkurim* in light of their ultimate destination—the Temple. *Bikkurim*, according to the Rambam, are genuine Temple offerings whose status is similar to that of a sacrifice (*Hilkhot Bikkurim* 2:16, 19 and 3:1).[[18]](#footnote-18) For this reason, R. Menachem Ziemba argues (*Kuntres Otzar Ha-Sifrei*, pp. 29-31), *Keilim* 1:6 groups *bikkurim* together with the *omer* offering and the two loaves of *Shavuot*: What they have in common is that they are all special offerings to the Temple that can come only from the land of the Divine Presence.[[19]](#footnote-19) Thus *bikkurim*, in addition to representing either category #1 or #3 (and possibly being contingent upon category #5, the sanctity of the soil—see footnote #1 above), are also a function of category #4 (the land of the Temple).

1. In addition to *bikkurim*, another central mitzva of the Land of Israel that does not seem to adhere to the typical pattern of soil-based *mitzvot* is *challa*. On the one hand, *challa* resembles *teruma* and tithes in that the dough or bread is forbidden prior to the separation of *challa*, and both Rashi (*Kiddushin* 37a) and *Tosafot* (*Bava Batra* 81a) lump it together with the other “*mitzvot ha-teluyot ba-aretz*.” On the other hand, the laws of *challa* include multiple possible exceptions to the usual rules of the soil-based *mitzvot*, such as: (1) the obligation to begin the practice of separating *challa* immediately upon the Jewish people’s entry into the Land of Israel, even prior to the conquering and distribution of the Land (*Sifrei Bamidbar* 15:18); (2) an obligation to separate *challa* from unripe grains and from other grains that are exempt from tithes (*Challa* 1:3 and *Yerushalmi* there); (3) an obligation to separate *challa* from grain that grew prior to the Jews’ arrival in the Land of Israel or from grain that is imported from other lands (*Challa* 2:1 and Yerushalmi there)[[20]](#footnote-20); (4) an obligation to separate *challa* in territory that lies outside the boundaries of the immigrants from Babylonia (see Rambam’s commentary on *Challa* 4:8) or to separate *challa* after the nullification of the “sanctity of the Land” (*Ketubot* 25a and *Nidda* 47a)[[21]](#footnote-21); and (5) the rabbinic obligation to separate *challa* anywhere in the world, in contrast to *teruma* and tithes (see *Tosafot Kiddushin* 36b). Also, the need for an explicit exclusion of other lands (*Bamidbar* 15:19), similar to *bikkurim*, suggests that *challa* is not fundamentally a soil-based obligation (*Sefer Ha-mikna Kiddushin* 36b).[[22]](#footnote-22)

If *challa* is indeed not a function of category #5, what aspect of the Land of Israel might it reflect? Rather than applying to the produce of the Land of Israel, like *teruma* and tithes, perhaps the obligation of *challa* applies to the bread eaten by the inhabitants of the Land of Israel. In other words, *challa* may relate to the Land of Israel as a place of Jewish inhabitance (category #3),[[23]](#footnote-23) rather than to the soil of the Land (category #5).[[24]](#footnote-24)

1. According to R. Ilai, the *mitzvot* to give parts of a slaughtered animal and the first part of a shearing to a priest (*Devarim* 18:3-4) apply only in the Land of Israel, because of a comparison to *teruma* (*Chullin* 136a). Which aspect of the Land of Israel do these *mitzvot* reflect? What are the boundaries within which they should be practiced?

**Questions or Comments?**

Please email me directly with your feedback at judahlgoldberg@gmail.com!

1. Rashi, in explaining that soil-based obligations are “incumbent upon the ground or its produce,” lists ten examples: “*terumot* and tithes; *challa*; *leket*, *shikhecha* and *pei’a*; the sabbatical year; *chadash*; *orla*; and *kil’ayim*” (*Kiddushin* 37a). *Bikkurim*, we should note, is conspicuously absent. Nonetheless, *bikkurim* in practice likely require the sanctity of the soil; see *Gittin* 47a-b and Rambam *Hilkhot Bikkurim* 2:15 (however, see Rashi there). Conceivably, this could merely be a condition for their sanctified status, rather than the driving force behind the mitzva. By comparison, however, the sanctity of *challa* does not seem to depend on the sanctity of the soil; see “For Further Thought,” #2 below. [↑](#footnote-ref-1)
2. Other approaches in the *Rishonim* do not follow R. Shimshon’s broad characterization but instead offer specific reasons why we might have thought to apply *bikkurim* even outside the Land of Israel, such as the juxtaposition of *bikkurim* with the universal prohibition of cooking meat and milk (*Tosafot*). Still, the fact that we could entertain the possibility of *bikkurim* outside the Land, in contrast, for instance, to *teruma* and tithes, might reflect fundamental differences between them. The question becomes, then, what the phrase “from your land” teaches us. Does it teach us to ultimately classify *bikkurim* as a standard soil-based mitzva, or does it merely indicate that **despite** *bikkurim*’s distinct character, they are nevertheless offered only from the Land of Israel? [↑](#footnote-ref-2)
3. See *Bikkurim* 1:3 and *Yerushalmi* there. [↑](#footnote-ref-3)
4. See *Shemot* 13:5 and 33:1-3; *Devarim* 6:3, 11:9, 26:15 and 27:3; *Yehoshua* 5:6; and *Yirmiyahu* 11:5 and 32:22. [↑](#footnote-ref-4)
5. Admittedly, the phrase “land flowing with milk and honey” does not appear in *Sefer Bereishit*. See Ramban on *Devarim* 26:15. [↑](#footnote-ref-5)
6. Contrast, for instance, with *viduy ma’aser* (confession over tithes), in which the phrase “land flowing with milk and honey” (*Devarim* 26:15) appears, but no rules are derived from it (see *Ma’aser Sheini* 5:13-14). [↑](#footnote-ref-6)
7. Ibn Ezra and Chizkuni similarly interpret the verse. However, in a second interpretation the Ramban renders the verse as a statement of intention, rather than as a statement of confirmation. [↑](#footnote-ref-7)
8. According to this interpretation, the mitzva of *bikkurim* constitutes yet another halakhic reflection of “the land of the *Avot*” ([see *shiur* #23](http://vbm-torah.org/archive/sinai/23sinai.htm)). [↑](#footnote-ref-8)
9. Both the *Minchat Chinukh* (91:[9 in Mechon Yerushalayim ed.]) and R. Menachem Ziemba (*Kuntres Otzar Ha-Sifrei*, printed in *Ambuha De-Sifrei*, p. 36) understand the Ramban in this fashion. Also see R. Shlomo Sirlio on *Yerushalmi Bikkurim* 1:8 (printed in R. Kalman Kahana, *Masekhet Bikkurim: Cheiker Ve-iyyun*, 1989). [↑](#footnote-ref-9)
10. The *Minchat Chinukh* carries this logic one step further by asking whether other lands that are captured by the Messiah and happen to be “flowing with milk and honey” will also be eligible for *bikkurim*. Clearly, he believes that all sanctified land (category #5) is fundamentally fit for *bikkurim*, as long as it also meets the condition of “flowing with milk and honey.” [↑](#footnote-ref-10)
11. Regarding the *Sifrei*’s quotation of Rabbi Yosi Ha-Gelili, the Ramban understands that he is commenting on the earlier opinion. Alternatively, we could suggest that Rabbi Yosi Ha-Gelili’s opinion is fully independent and is simply juxtaposed because he, too, derives his stance from the phrase “flowing with milk and honey.” Also see the textual variants to this passage, which already appear in the Ramban (*Shemot* 13:5) and Chizkuni (*Devarim* 26:9). [↑](#footnote-ref-11)
12. Characteristically, the Rambam does not explain how he arrives at his conclusion. R. Yosef Colon (Maharik) suggests that according to the Rambam, all opinions agree that the eastern bank of the Jordan is Biblically excluded from *bikkurim*. The only point of disagreement concerns a rabbinic requirement to offer *bikkurim* from that territory, which the first opinion in the *mishna* advances and Rabbi Yosi Ha-Gelili rejects (ResponsaMaharik 122:3). However, see the Rambam’s *Sefer Ha-Mitzvot*, positive commandment #125 and *Commentary on the Mishna* (cited below). The Maharik also glosses over the differences between the *mishna* and the *Sifrei*. Also see Responsa *Beit Ha-Levi* 2:50. [↑](#footnote-ref-12)
13. In our text of the *Yerushalmi*, this comment is attributed to Rabbi Yona. In R. Shlomo Sirlio’s text, the comment is attributed to Rabbi Yosi Ha-Gelili himself; however, R. Shlomo Sirlio interprets the passage differently. [↑](#footnote-ref-13)
14. According to the Ramban, Rabbi Yosi Ha-Gelili only allows *bikkurim* from territory held by the five tribes west of the Jordan. On the one hand, according to this view, Rabbi Yosi Ha-Gelili could understand “flowing with milk and honey” as a condition, rather than as a defining feature of the land. Alternatively, he might believe that this limited area symbolizes the promise that God made regarding the entire historical Land of Canaan. The Ramban notes that the *Sifrei* elsewhere sets apart the territories of the five tribes from the rest, for “they constitute the primary land, for through [that land] did God promise [the Jewish people], for it is ‘flowing with milk and honey’” (*Shemot* 13:5). [↑](#footnote-ref-14)
15. Regarding the fact that only five tribes are mentioned in *Shemot* 13:5, the *Mekhilta* explains that the Torah is speaking about “the land of five tribes who are [listed as] seven in another place (*Devarim* 7:1)” (Horowitz ed.). I take this to mean that this verse, as well as the parallel one about *bikkurim*, is ultimately referencing the entire Land of Canaan. Admittedly, various commentators on the *Mekhilta* offer other interpretations, some by amending the text. Also see the Ramban, who tersely states that the *Mekhilta* is consistent with his reading of the *Sifrei*. [↑](#footnote-ref-15)
16. Also see *Sifrei* on *Devarim* 26:3: “‘To give to us’… Rabbi Shimon says, ‘to exclude ‘across the Jordan,’ which you took by yourself.’” The *Yerushalmi* goes on to assert that this opinion is slightly more inclusive than that of Rabbi Yosi Ha-Gelili. Whereas Rabbi Yosi Ha-Gelili excludes any territory east of the Jordan, the opinion that the *Sifrei* attributes to R. Shimon would allow *bikkurim* from the land held by families of the tribe of Menashe, who never requested a share of the eastern bank but were instructed by Moshe to join the tribes of Reuven and Gad there (see *Bamidbar* 32:33). This represents a middle position that does not directly correspond to any “map” of the Land of Israel that we have previously seen. [↑](#footnote-ref-16)
17. Also see R. Shlomo Sirlio on the *mishna*. [↑](#footnote-ref-17)
18. Also see Rashi, Rashbam and Chizkuni on *Vayikra* 2:12 and Ramban on *Bamidbar* 5:9. [↑](#footnote-ref-18)
19. See [*shiur* #18](http://vbm-torah.org/archive/sinai/18sinai.htm), including n. 14. R. Ziemba further notes that the status of *bikkurim* seems to be the subject of a Tannaitic debate (see *Bikkurim* 3:12 and *Yerushalmi Bikkurim* 1:2) and thus explains the conflicting versions of the statement in *Keilim* 1:6 that either include or omit *bikkurim* from the text. The Rambam does mention *bikkurim* (*Hilkhot Beit Ha-bechira* 7:12), which is consistent with his rulings that their status is similar to that of Temple sacrifices. Also see *mori ve-rabbi* R. Hershel Schachter, *Nefesh Ha-Rav*, 78. [↑](#footnote-ref-19)
20. See *Chiddushei Rabbeinu Chayyim Ha-Levi*, *Hilkhot Terumot* 1:22 and *Iggerot Ha-Grid Ha-Levi*, beginning of *Hilkhot Melakhim*, 2. [↑](#footnote-ref-20)
21. See R. Ahron Soloveichik, *Parach Mateh Aharon*, *Sefer Ahava*, 179. [↑](#footnote-ref-21)
22. See the excellent articles on this topic by R. Yair Kahn, “*Ma’amad Challa Ke-mitzva Ha-teluya Ba-aretz*,” *Alon Shevut* 86, 16-24 and *mori ve-rabbi* R. Michael Rosensweig, “*Be-inyan Mitzvot Challa U-teruma Be-Eretz Yisrael*,” *Kol Tzvi* 3 (5763[2001]), 25-48. [↑](#footnote-ref-22)
23. However, regarding the relevance of category #1 (the land of the *Avot*) to *challa*, see [*shiur* #23](http://vbm-torah.org/archive/sinai/23sinai.htm), n. 18. [↑](#footnote-ref-23)
24. This distinction can also answer a different question: Inasmuch as *challa* is a form of “*teruma*” (*Me’ila* 15b), why should grains be “double taxed” with two different *teruma* obligations – one at the point of harvesting (*teruma gedola*) and another at the point of bread preparation (*challa*)? If, however, the two *mitzvot* apply to fundamentally different entities—*teruma* to the produce of the Land of Israel and *challa* to the bread of the people of Israel—then the apparent redundancy between them is eliminated. [↑](#footnote-ref-24)