

בראשית פרק א:כז-כח
ויברא א-להים את האדם בצלמו
בצלם א-להים ברא אתו
זכר ונקבה ברא אתם:
ויברך אתם א-להים

ויאמר להם א-להים פרו ורבו ומלאו את הארץ וכבשה ורדו בדגת הים ובעוף השמים ובכל חיה הרמשת על הארץ:

Genesis 1:27-28

G-d created the human in His image

In His image He created him

Male and female He created them

G-d blessed them

G-d said to them: Be fruitful and multiply; fill the land and subdue it; dominate the fish of the sea and the birds of the heavens, and every wild thing that swarms on the land¹.

How can the anonymous Mishnah, and eventually the Halakhah, contend that the obligation of procreation applies to men and not to women? Rabbi Yochanan ben Berokah's incredulous response to the anonymous Mishnah: "Scripture says about both of them "G-d blessed them, saying to them: 'Be fruitful and multiply . . . !?' seems compelling. This question has generated extensive discussion for at least 2000 years², including at least one contemporary book. Explanations of the Halakhah take two essential forms: literary and ideological. That is to say, some try to demonstrate that the Halakhah really fits well into the verse, whereas others seek to find a rationale for the Halakhah that justifies reading the verse implausibly.

Our focus this week is on the approach of the 19th Century Rabbi Meir Simkhah of Dvinsk in his Biblical commentary Meshekh Chokhmah³ (hereafter MC). He offers a reading and two rationales, all of which are noteworthy. We'll discuss the reading first and then the rationales.

MC notes that human beings are blessed/commanded to procreate three separate times in Genesis: 1:28, 9:1 and 9:7, and 35:11. Of these, the first two are grammatically plural, whereas the third is singular. This by itself is not at all troubling, as the third is spoken directly to an individual Yaakov.

Rav Yosef (Yebamot 65b) claims that 35:11 is the source for the exclusion of women; he does not tell us how to reconcile this with 1:28 or 9:1-7. Meshekh Chokhmah reasonably assumes that Rav Yosef sees 35:11 as superseding 1:28. The remaining difficulty is 9:1-7, and here MC makes the sharp observation that the addressees there are "Noach and his sons", specifically, with no mention of their wives, even though the wives have appeared in the previous lists of humans leaving the ark. MC therefore concludes that between 1 and 9 the commandment

¹ In my series "Divine Fantasy", available [here](#), I address at length the question of the shift from singular to plural, which must be compared with Genesis 5:1-2./

² The Talmudic discussion of this Mishnah, from Yebamot 65b) is appended with translation

³ Appended with translation

was narrowed to males. 35:11 is singular because it addresses a single male, Yaakov, whereas 9:1-7 remains plural since it is addressing multiple males, Noach and his sons.

I have a few points that may advance this analysis. Genesis 1:22 also contains a command “(you plural) be fruitful and multiply”, to various creatures, but at that point no mention has been made of creature genders. Moreover, the plural of that command likely refers to only some of the nouns included in the antecedent; the command is to be “fruitful and multiply” in the water, whereas the antecedent nouns include both water creatures and birds. Indeed, the following phrase specifically instructs birds to multiply in the land⁴. Similarly, then, the command to human beings may refer to the species, without taking cognizance of gender, and the antecedent of the plural pronoun in 1:28 may be “adam-human” alone, not “zakhar unekeivah – male and female”.

If this argument is reasonable, MC can argue that 1:28 is deliberately ambiguous; while in immediate context it most likely applied to both genders, it was written so as to allow for a later understanding as limited only to males.

Having established that the halakhic reading is reasonable if one assumes a progression, we are left to explain why the progression happened. MC’s two suggestions are:

- a. Childbirth was originally painless, and therefore the commandment applied to men and women equally. Chavah’s sin generated as punishment the pain of childbirth, with accompanying risk to life. G-d does not impose unreasonable demands on His creatures, and demanding that women experience that pain, and take that risk, would be unreasonable. Therefore He removed the obligation from women.
- b. It is against human nature to reject the beloved in favor of the unloved, and humans generally marry the ones they love. If women were obligated in procreation, then Halakhah would require them to divorce their husbands after ten years of childless marriage. This would be unreasonable. Since polygamy is permitted, this argument does not apply to men, who can marry an additional wife after ten childless years. MC here is building on the halakhic tradition’s decision not to make men divorce their childless wives and marry a more fertile woman when polygamy is impossible or, as in our day, halakhically proscribed by the decree of Rabbeinu Gershom.

The second suggestion leaves open the question of why polygamy is permitted and polyandry forbidden; Deborah Klapper notes that one might argue in reverse that polygamy is permitted only because of the command to procreate, so as to avoid forcing men to divorce their childless wives⁵. We can also ask whether we are using a cannon to shoot a flea; why not maintain the commandment but eliminate the consequence, in other words allow childless women to remain married to the men they love and simply pray for a better outcome?

It is the first suggestion that we will focus on, however. Let’s begin by noticing that this is not an offhand exegetical insight, but rather takes on the character of an extended halakhic argument. MC marshals a large set of halakhic materials to establish that a proposed Halakhah must meet the standard “Her ways are ways of Pleasantness”, and that imposing childbearing

⁴ Although not to be fruitful

⁵ There might also be an economic concern for the wife here, as childless divorced women would have no family to support them in their old age.

would fail that standard. It seems to me that he is not arguing that the text compels his reading, but rather that the standard requires the adoption of such a reading.

MC also seems to shift back and forth as to whether it is the pain, the risk, or the combination of pain and risk that generates the conclusion that procreation cannot be mandatory for women. In our day the risk is much less, and anesthetics often have significant impact – should that affect the halakhah? In practice it is very difficult to move halakhah that dramatically, from one side of a Tannaitic dispute to another⁶.

Another halakhic challenge to MC's suggestion is that some medieval authorities suggested that women are in fact rabbinically obligated to procreate⁷.

I want here to play out what I see as a reasonable halakhic implication of MC's position, in the area of birth control⁸.

If G-d cannot demand that women have children, kal vachomer men cannot demand this of them. Indeed, no one suggests that a woman is obligated to marry a man so as to enable the man to fulfill his obligation of procreation.

Therefore, it cannot be prohibited for women to use birth control.⁹

When engaged couples come to ask rabbis “the birth control question”, then, it is proper to frame the issue as follows: Of course the woman can use (some types of) birth control. The real question is whether the man can marry her in the knowledge that she will practice contraception¹⁰. In this perspective, the proper halakhic calculation is whether not marrying her, or divorcing her, is likely to improve his chances of being in a procreative marriage over time. Generally, I suspect, the answer is no.

Of course, this discussion only addresses the question of coercion. MC makes clear that procreation is a good, and rabbinic literature is replete with gender-neutral encomia to procreation. Furthermore, some rishonim believe that women are rabbinically obligated to procreate¹¹, and others construct a quasi-obligation to participate in the mitzvah, recognizing that men cannot (or at least in their time could not) fulfill it without women's participation. In other words, saying that a woman may use (some types of) contraception – even saying that she has the right to such use – does not imply that she ought to. Furthermore, I tend to adopt the pastoral

⁶Perhaps MC also factored the experience of pregnancy as such into his suggestion. Regardless, we must be very careful, when making this argument, to be pellucid that it does not generate a right of abortion. The principle “her ways are ways of pleasantness” does not prevent G-d from demanding that we surrender our lives on occasion; demands that are unreasonable in one context are reasonable in another., and preventing fertilization is not the same issue as terminating a fetus.

⁷ I discuss the question of women's rabbinic obligation, which remains a contentious halakhic issue, in my series on Kibbud Av VaEim.,

⁸ My approach here owes much to the broad approach of Rabbi Yehudah Herzl Henkin to issues of gender, but does not to the best of my knowledge follow his specific halakhic prescriptions on this issue.

⁹ So long as they use means that do not violate prohibitions, such as one against self-castration.

¹⁰ The question of whether, once married, he can have marital relations with her, is one of means rather than of principle. He has an obligation of *onah* regardless, and so cannot even use her lack of fertility as an excuse for avoiding marital relations. Some barrier methods raise issues of hashchatat zera for him, but there are certainly methods that are unproblematic in this regard.

¹¹ MC is of course aware of this. This obligation is offered to explain why we might coerce men to enable women to marry; I suspect that MC would argue that the standard for excusing women from the obligation should be low.

maxim that “If you’re not ready to greet children with joy, don’t have sex”, as no means of contraception is perfectly reliable.

תלמוד בבלי מסכת יבמות דף סה עמוד ב

\מתני\

האיש מצווה על פריה ורביה, אבל לא האשה;
רבי יוחנן בן ברוקה אומר: על שניהם הוא אומר (בראשית א') "ויברך אותם א-להים ויאמר להם [א-להים] פרו ורבו...!"

\גמ\

מנא הני מילי?

אמר ר' אילעא משום ר' אלעזר בר' שמעון: אמר קרא: (בראשית א') "... ומלאו את הארץ וכבשוה" - איש דרכו לכבש, ואין אשה דרכה לכבש.
אדרבה!? וכבשוה תרתי משמע?!
אמר רב נחמן בר' יצחק: "וכבשה" כתיב.
רב יוסף אמר מהכא: (בראשית ל"ה) "אני א-ל ש-די פרה ורבה", ולא קאמר 'פרו ורבו'.

ואמר רבי אילעא משום ר' אלעזר בר' שמעון: כשם שמצוה על אדם לומר דבר הנשמע, כך מצוה על אדם שלא לומר דבר שאינו נשמע.
רבי אבא אומר: חובה, שנאמר: (משלי ט') "אל תוכח לץ פן ישנאך; הוכח לחכם ויאהבך".

וא"ר אילעא משום רבי אלעזר בר' שמעון: מותר לו לאדם לשנות בדבר השלום, שנאמר (בראשית נ') "אביך צוה וגו' כה תאמרו ליוסף אנא שא נא וגו'".
ר' נתן אומר: מצוה, שנאמר (שמואל א' ט"ז) "ויאמר שמואל: איך אלך? ושמע שאול והרגני! וגו'".
דבי רבי ישמעאל תנא: גדול השלום, שאף הקדוש ברוך הוא שינה בו, דמעיקרא כתיב (בראשית י"ח) "ואדוני זקן", ולבסוף כתיב "ואני זקנתי".

"רבי יוחנן בן ברוקה אומר" –

אתמר: רבי יוחנן ור' יהושע בן לוי:

חד אמר: הלכה כרבי יוחנן בן ברוקה;

וחד אמר: אין הלכה כרבי יוחנן בן ברוקה .

...

מאי הוה עלה?

ת"ש: דאמר ר' אחא בר חנינא אמר ר' אבהו אמר ר' אסי: עובדא הוה קמיה דרבי יוחנן בכנישתא דקיסרי, ואמר: יוציא ויתן כתובה.

ואי ס"ד לא מפקדה, כתובה מאי עבידתה?!

דלמא בבאה מחמת טענה,

כי ההיא דאתאי לקמיה דר' אמי.

אמרה ליה: הב לי כתובה!

אמר לה: זיל, לא מיפקדת.

אמרה ליה: מסיבו דילה, מאי תיהוי עלה דהך אתתא?

אמר: כי הא ודאי כפינן.

ההיא דאתאי לקמיה דרב נחמן.

אמר לה: לא מיפקדת!

אמרה ליה: לא בעיא הך אתתא חוטרא לידה ומרה לקבורה?

אמר: כי הא ודאי כפינן.

יהודה וחזקיה תאומים היו - אחד נגמרה צורתו לסוף תשעה, ואחד נגמרה צורתו לתחלת שבעה.

יהודית דביתהו דר' חייא הוה לה צער לידה.

שנאי מנא ואתיא לקמיה דר' חייא.

אמרה: אתתא מפקדא אפריה ורביה?

אמר לה: לא.

אזלא, אשתיא סמא דעקרתא.

לסוף איגלאי מילתא.

אמר לה: איכו ילדת לי חדא כרסא אחריתא,

דאמר מר: יהודה וחזקיה אחי פזי וטוי אחוותא.

ולא מיפקדי?! והאמר רב אחא בר רב קטינא א"ר יצחק: מעשה באשה אחת שחציה שפחה וחציה בת חורין וכפו את

רבה ועשאה בת חורין?!

אמר רב נחמן בר' יצחק: מנהג הפקר נהגו בה.

Talmud Yebamot 65b

Mishnah

The man is commanded regarding fruitfulness and multiplication, but not the woman;

Rabbi Yochanan ben Berokah says: Scripture says about both of them “G-d blessed them, saying to them: ‘Be fruitful and multiply . . . ’!?”

Talmud

What is the Biblical source of Rabbi Yochanan ben Berokah’s position?

Said R. Ilai in the name of R. El’azar son of R. Shimon: Scripture says “. . . and (you plural) fill the land and (you plural) subdue it” – it is the way of the man to subdue, and not the way of the woman to subdue.

Just the opposite should be derived from that clause, as it says “(you plural) dominate it”!?”

Said Rav Nachman bar Yitzchak: It is written without the vav for the plural (although pronounced with).

Rav Yosef said: From here: “I am E-l Sha-ddai: (You singular) be fruitful and multiply”, rather than saying ‘(You plural) be fruitful and multiply’.

Another thing Rabbi Ilai said in the name of R. El’azar son of R. Shimon: “Just as there is a mitzvah upon a person to say something that will be heeded, so too there is a mitzvah on a person not to say something that will not be heeded.

Rabbi Abba said: This is (not merely a mitzvah but rather) an obligation, as Scripture says: “Do not rebuke a scoffer lest he hate you; rebuke a sage and he will love you.”

Another thing Rabbi Ilai said in the name of R. El’azar son of R. Shimon: A person may alter (the truth) for the sake of peace, as Scripture says: . . .

R. Natan said: It is a mitzvah to do this, as Scripture says . . .

The House of Rabbi Yishmael taught the following beraita: “Great is peace, for even The Holy Blessed One alters the truth for the sake of peace . . .

“Rabbi Yochanan ben Berokah said: Rabbi Yochanan ben Berokah

An Amoraic dispute between Rabbi Yochanan and Rabbi Yehoshua ben Levi:

One said: The halakhah follows Rabbi Yochanan ben Berokah;

The other said: The halakhah does not follow Rabbi Yochanan ben Berokah.

. . .

What was said about this issue?

Come hear the following evidence: R. Acha bar Chanina said R. Avahu said R. Assi: A case (of a woman suing for divorce because she was long-term childless) came before Rav Yochanan in the public meeting house in Caeserea, and he said: The man must divorce her and pay her ketubah.

And if you were to think that woman were not commanded, why would he have to pay the ketubah (since she sued for divorce without sufficient justification)?!

Maybe she came with a sufficient rationale,

As in the case of a woman who came before R, Ami.

She said to him: Award me my ketubah!

He told her: Go away! You are not commanded (to procreate).

She said to him: In my old age, what will happen to this woman?

He said: In such a case we certainly compel (the man to divorce her).

A(nother such) woman came before Rav Nachman:

He said to her: You are not commanded!

She said to him: Does not this woman need a walkingstick for her hand and a shovel for burial?

He said: In such a case we certainly compel (the man to divorce her).

(Yehudah and Chizkiyah were twins, one of whom was complete at the end of nine months, the other at the beginning of the seventh.)

Yehudit the wife of R. Chiyya had a painful childbirth.

She changed clothes and came before R. Chiyya.

She said: Is a woman commanded regarding being fruitful and multiplying?

He said to her: No!

She went and drank a sterilizing potion.

In the end this became known.

He said to her: If only you had borne me one more full stomach,

as Mar said: Yehudah and Chizkiyah were twin brothers: Pazi and Tavi were twin sisters.

Are women really not commanded!? But said R. Acha son of R. Ketina said R. Yitzchak: A true story: A woman who was half slave and half free, and they forced her master to free (her enslaved half on the ground that otherwise she could not marry)?!

Said R. Nachman bar Yitzchak: They behaved lewdly with her.

משך חכמה לבראשית ט:ז

- 1) "פרו ורבו וכו'" –
- 2) לא רחוק הוא לאמר הא שפטרה התורה נשים מפו"ר וחייבה רק אנשים כי משפטי ה' ודרכיו דרכי נועם וכל נתיבותיה שלום ולא עמסה על הישראלי מה שאין ביכולת הגוף לקבל,
- 3) ומכל דבר האסור לא מנעה התורה בסוגה ההיתר, כמו שאמרו פרק כל הבשר (חולין קט סע"ב),
- 4) ומשום זה לא מצאנו מצוה להתענות רק יום אחד בשנה, וקודם הזהירה וחייבה לאכול,
- 5) וכן לא מנעה המשגל מכל בריה לבד ממשא רבינו (שבת פז) לפי שלא היה צריך לגודל מעלתו ולזהירות גופו,
- 6) ויותר מזה, במלחמה, בעת הנצחון, לגודל החום והרחבת הלב, ידע א-ל דעות כי אז לא יתכן לעצור בעד הרוח בעת חשקו באשה יפ"ת, והתירה התורה יפ"ת א"א, וכמאמרם (קדושין כא סע"ב) לא דברה תורה אלא כנגד יצה"ר,
- 7) וכבר האריך בזה מחבר אחד,
- 8) ומצאנו איך היה זאת לאבן פינה לאבות הקבלה, שפטרו מיבום מי שמתו בניו אח"כ משום דרכיה דרכי נועם (יבמות פז:).
- 9) וא"כ נשים שמסתכנות בעיבור ולידה, ומשום זה אמרו מיתה שכיחא - עיין תוס' כתובות פ"ג ע"ב ד"ה מיתה שכיחא - לא גזרה התורה לצוות לפרות ולרבות על אשה,
- 10) וכן מותרת לשתות כוס עיקרין, וכעובדא דיהודית דביתהו דר"ח סוף הבא ע"י,
- 11) רק לקיום המין עשה בטבעה שתשוקתה להוליד עזה משל איש (עיין ב"מ פד רע"א ורש"י ד"ה כי כאיש לשון אחר וכו'), ומצאנו לרחל שאמרה (בראשית ל) "הבה לי בנים ואם אין מתה אנכי",
- 12) ובזה ניחא הך דאמר רב יוסף סוף פרק הבא ע"י דאין נשים מצוות בפו"ר מהכא "אני א-ל ש-די פרה ורבה", (בראשית לה, יא), ולא קאמר "פרו ורבו" (בראשית א, כח) –
- 13) היינו, דבאדם וחזה שבירך אותן קודם החטא, שלא היה צער לידה, היו מצוות שניהם בפו"ר ואמר להם פרו ורבו,
- 14) אבל לאחר החטא, שהיה לה צער לידה (בראשית ג, טז) והיא רוב פעמים מסתכנת מזה עד כי אמרו (נדה לא:): אשה נשבעת שלא תזדקק כו',
- 15) לכן בנח, אף דכתיב "ויאמר להם פרו ורבו", הלא כתיב קודם "ויברך את נח ואת בניו", אבל נשיהם לא הזכיר, שאינם בכלל מצוה דפו"ר,
- 16) וביעקב קאמר "פרה ורבה" (בראשית לה, יא),
- 17) וזה נכון, ובמהרש"א סנהדרין נ"ח (נט: סד"ה גמרא והרי פ"ו) הניח זה בויש ליישב וכוון לזה ודו"ק.
- 18) עוד יתכן לאמר בטעם שפטרה התורה נשים מפו"ר –
- 19) משום דבאמת הלא הטביעה בטבע התשוקה, ובנקבה עוד יותר, כמו שאמרו (קדושין ז) טב למיתב טן דו וכו',
- 20) ודי במה שהיא מוכרחת בטבע,
- 21) וע"כ דעיקר המצוה היא כמו דתנן ביבמות (סא: במשנה) לא יבטל אדם מפו"ר אא"כ יש לו בנים כו', דאם נשא אשה ולא ילדה, מחוייב ליקח אשה שיש לה בנים,
- 22) ומדרך התורה לבלי לגדור הטבע,
- 23) וכיו"ב אמרו "דרכיה דרכי נועם" כמוש"כ,
- 24) ולכן לגזור על האשה כי תנשא לאיש ולא יוליד תצא מאהוב נפשה ותקח איש אחר - זה נגד הטבע לאהוב השנוא ולשנוא האהוב, ורק האיש שיכול לישא עוד אחרת עליו הטילה התורה מצוה,
- 25) וזה המשך המאמרים שאמר ר' אלעזר בר"ש סוף פרק הבא ע"י, ודו"ק.

Meshekh Chokhmah Genesis 9:7

- 1) “Be fruitful and multiply” –
- 2) It is not implausible to say that the reason that the Torah exempted women from “be fruitful and multiply”, obligating only men, is that the laws of Hashem and His ways are ways of pleasantness, and all its paths are peaceful, and so it did not impose a burden on the Jew that the body cannot accept.
- 3) With regard to every prohibition, the Torah left the permissibility of something in the same category unobstructed, as per Chullin 109b.
- 4) For this reason we find no commandment to fast other than one day a year, and prior to that fast the Torah commands and obligates eating,
- 5) and similarly it did not withhold copulation from anyone other than Mosheh Rabbeinu (Shabbat 87), since owing to his great spiritual height and his body’s punctiliousness, he had no need for.
- 6) More than this, in war, at a time of victory, owing to the great fever and breadth of heart, the G-d Who Knows Minds knew that it would be unreasonable to constrain that spirit at the time that he lusts for “the attractive captive”, and the Torah permitted even a married “attractive captive”, as per the Sages’ statement: “The Torah here spoke taking into account the evil inclination”.
- 7) A different author has already addresses this at length¹².
- 8) We have found this to be a cornerstone for the Greats of the Tradition, as they excluded from the institution of levirate marriage a woman whose child from her first husband died after her remarriage on the ground that “Her ways are ways of pleasantness”. (Yebamot 87b).
- 9) Accordingly, since women are endangered by pregnancy and birth, to the point that the rabbis said “Death is common” – see Tosafot Ketubot 83b – the Torah did not decree the command of being fruitful and multiplying on women.
- 10) They are also permitted to drink a sterilizing potion, as per the case of Yehudit the wife of Rav Chisda on Yebamot 65b.
- 11) However, so as to sustain the species, He put in her nature a desire to procreate stronger than that of men (see Bava Metzia 84a and Rashi thereupon)¹³, and we have found Rachel saying “Give me children! If not, I am dead” (Breishit 30).
- 12) On this basis, we can explain well the statement of Rav Yosef on Ketubot 65b that the exemption of women from the commandment of being fruitful and multiplying derives from Genesis 9:7 “I am E-l Sha-ddai; you (singular) be fruitful and multiplying”, rather than you (plural) as in Genesis 1:28 –
- 13) because Adam and Chavah, who were blessed before the sin, when childbirth was not a travail, were both commanded to be fruitful and multiply, as He said to them: You (plural) be fruitful and multiply,
- 14) But after the sin, childbirth became a travail (Genesis 3:16), and she is usually endangered by this to the point that the Sages say (Niddah 31) “A woman swears never to engage in intimate relations again”¹⁴,
- 15) so regarding Noach, even though Scripture writes “You (plural) be fruitful and multiply” (Genesis 9:1), that clause is preceded by “He blessed Noach and his

¹² I would much appreciate any insights with regard to this reference.

¹³ In context this may refer to sexual rather than procreative desire

¹⁴ In context this may relate to pain rather than danger

- sons”, without mentioning their wives, because they were not included in the command to be fruitful and multiply,
- 16) and regarding Yaakov He said “you (singular) be fruitful and multiply” (Genesis 35:11).
 - 17) This is correct, and when Maharsha to Sanhedrin 59b ends his presentation of the singular/plural differences among these verses by saying “but these can be resolved”, he refers to what I have said.
 - 18) It is further reasonable to say regarding the reason that the Torah exempted women from being fruitful and multiplying –
 - 19) That indeed He embedded this yearning in nature, and to a greater extent in women, as the Sages say (Kiddushin 7) “Women think it is better to be married to any man”¹⁵,
 - 20) and her natural compulsion is sufficient,
 - 21) as certainly the essential mitzvah is as presented in Mishnah Yebamot 61b “A man must not remove himself from being fruitful and multiplying unless he has sons”, so that if he married a woman and she has not given birth, he is obligated to marry a woman who can have children,
 - 22) and it is the way of Torah not to fence in nature,
 - 23) and along these lines the Sages say “Her ways are ways of pleasantness”, as I wrote above,
 - 24) and therefore, to decree on a woman that if she is married to a man and he doesn’t sire, that she should leave the love of her soul and marry another man – this is against nature, to love the hated and hate the beloved, so it is only on the man, who can marry another woman in addition to this first wife, that the Torah imposed the commandment.
 - 25) This is implied by the flow of the statements of R. Elazar son of Rabbi Shimon on Yebamot 65b.¹⁶

¹⁵ This statement has implications in other halakhic contexts that I hope to address in writing soon.

¹⁶ Rabbi Elazar son of Rabbi Shimon is first cited as bringing a proof-text for the exemption of women, and then for saying that “Just as there is a mitzvah to say things that will be heeded, so too there is a mitzvah to not say things that will not be heeded”. The second statement has no obvious contextual relevance. Meshekh Chokhmah is apparently arguing that the second statement is the ground of the first, in other words that R. Elazar son of R. Shimon thinks that Hashem exempted women because they would find it very difficult to obey. Note, however, that R. Elazar’s proof-text rests on a claim that it is not the way of women to conquer/subordinate others, and therefore one can accept Meshekh Chokhmah’s structural reading but contend that R. Elazar son of R. Shimon has a different understanding that Meshekh Chokhmah of why such a command would likely not be well-heeded.