

The mysterious plowshare ordeal (*phāladivya*).

A note on *Yājñavalkya-smṛti* II, 100

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Abstract

This paper focuses on the plowshare ordeal (*phāladivya*), the eighth ordeal to be discussed in the *Smṛtis*. Although the information about its procedure is scarce, I analyze all the textual sources about the *phāla* ordeal, coming from the tradition of *Dharmaśāstra* (*Yājñavalkya-*, *Bṛhaspati-*, *Pitāmaha-smṛti*, and Raghunandana's *Divyatattva*) and from that of *Purāṇas* (*Viṣṇudharmottara-purāṇa* and *Kumārikā-khaṇḍa*). After considering the sources related to it, I try to demonstrate that the first mention of the *phāla* ordeal, found in *Yājñavalkya-smṛti* II, 100, is a later addition to the original core of the text.

Key Words – Indian Law; Ordeals; Plowshare ordeal; *Dharmaśāstra*; *Smṛti*

1. Introduction

The ordeals are a fundamental constituent of the Indian judicial procedure (*vyavahāra*), as they are one of the five modes of proof¹. Along with the oaths, the ordeals are used to settle legal disputes in the absence of human proofs². As a general rule, the ordeal procedure is used to ascertain the defendant's guilt or innocence. If he overcomes the trial, he will reach exculpation (*śuddhi/visuddhi*)³; otherwise, he will be punished.

The ordeal seems to be an archaic institution whose traces are found both in the Vedic collections (*RV* I, 158, 4-5; *RV* III, 53, 22; *AVŚ* II, 12, 8)⁴ and in other Vedic texts (*ChUp* 6, 16; *PB* 14, 6, 6; *JB* 3, 234-235)⁵. However, it is not possible to identify a proper ordeal institution until the *YSm*. Generic divine proofs are mentioned as *daiva* by Āpastamba (*ĀpDh* II, 11, 3; II, 29, 6) and as *śapatha* by Gautama (*GDh* XIII, 12). Manu discusses oaths and ordeals in the same subsection, referring to both with the term *śapatha*, although he outlines different procedures (*MDh* VIII, 109-116). Manu mentions at least two ordeals, i.e., those of fire (*agni*) and water (*ap*). After him, Yājñavalkya is the first to separate ordeals from oaths, and he describes five ordeals (*YSm* II, 98-117), i.e., those of scale (*tulā*), fire (*agni*), water (*ap*), poison (*viṣa*) and sacred libation (*kośa*), relating to them with the term *divya*, which then becomes their "canonical" label. This fivefold description of ordeals is also shared by Nārada (*NSm* XX, 1-48) and Viṣṇu (*VSm* IX-XIV). Conversely, Kātyāyana discusses seven ordeals (*KSm* 411-461), as he adds the ordeals of rice grains (*taṇḍula*) and red-hot gold (*taptamāṣa*)⁶. Another sevenfold description is found in a late sub-recension (P⁷) of the *NSm* (*NSm* I, 337-348 of Jolly's edition)⁸. Finally, a description of nine ordeals is found in Bṛhaspati (*BSm* I, 8, 1-92) and Pitāmaha (*Psm* 28-189), as they add the ordeal of plowshare (*phāla*) and that of *dharma* and *adharmādharmā*. Besides the *Smṛtis*, an eightfold description of ordeals is found in *VDhPu* III, 328, and *KuKh* 44, where all the ordeals are included except for *dharmādharmā*. Therefore, it appears that the ordeal institution has gradually grown over time and that, once an element is introduced in a *Smṛti*, it remains in subsequent ones.

Author's note: All translations from Sanskrit are by the author unless explicitly stated otherwise. When the original Sanskrit text is corrupted and consequently emended by the author, a note is added to the corrected Sanskrit passage, and a star (*) is added to the corresponding translation. My sincere gratitude goes to Peter C. Bisschop, Maria Piera Candotti, and Tiziana Pontillo for reading a draft of the present paper. I am also grateful to Andrea Farina for his help revising the English text. Eventually, I would like to thank the anonymous reviewers that corrected my mistakes, improved my translations, and gave me some hints to refine the argumentation.

¹ Starting from the *NSm*, the *Smṛtis* describe five modes of proof, divided into two groups. The witnesses (*sākṣin*), the document (*likhita*, *lekha*, *lekhyā*), and the possession (*bhukti*, *bhoga*) are part of the first group, i.e., the human proofs. The oaths (*śapatha*) and the ordeals (*divya*) are part of the second group, i.e., the divine proofs.

² See *MDh* VIII, 109; *YSm* II, 22; *NSm* XX, 1; *KSm* 217; *Psm* 29. See also Rocher (2012: 368-369, 387-393).

³ See, e.g., *YSm* II, 98; *YSm* II, 111. The term *śuddhi* literally means 'purification', and the term *visuddhi* means 'complete purification'. In the context of *vyavahāra*, the two terms have the extended meaning of 'exculpation', as the defendant is (religiously) cleansed of guilt, therefore, (legally) exculpated.

⁴ See Kane (1946: 361-362).

⁵ See Lariviere (1981: 2-4).

⁶ The term *taptamāṣa* (or *taptamāṣaka*) literally means 'red-hot *māṣa* of gold' (the *māṣa* is a particular weight of gold) and refers to the red-hot gold ordeal. However, I merely translate the label *taptamāṣa* with 'red-hot gold [ordeal]', omitting the weight (see, e.g., Lariviere 1981: 213-215). Furthermore, Kātyāyana mentions *taptamāṣa* as the seventh ordeal only in the list of *KSm* 460-461. Another ordeal is said as the seventh one in *KSm* 420, i.e., the touch of the child's head and the like (maybe a form of oath): *pañcādhikasya vā nāṣe tadardhārdhasya taṇḍulāḥ | tadardhārdhasya nāṣe tu sprṣet putrādīmastakam ||* 'Otherwise, the rice grains [ordeal should be administered] with an amount between five *suvarṇas* and a quarter of it. He should touch the head of his child and the like with [an amount] less than a quarter [of *suvarṇa*].'

⁷ The sub-recension P is formed by its homonymous manuscript and the apographs M2 and L4 (see Lariviere 2003: 38).

⁸ For the text, see Jolly (1885: 126-128).

However, there is one exception. The extant Yājñavalkya's text oddly mentions the *phāla* ordeal in *YSm* II, 100, although its list only mentions five ordeals (*YSm* II, 98). After that, the *phāla* ordeal is no longer mentioned until the *BSm* and *PSm*, and its absence is quite suspect and may suggest an interpolation to the original text of the *YSm*. Furthermore, the information we possess about the *phāla* ordeal is scarce, and more elements could be recollected only from the Purāṇic tradition (*VDhPu*, *KuKh*). This paper investigates the procedure of the *phāla* ordeal over its evolution (see § 2) and aims to demonstrate that the Yājñavalkya's verse that mentions it (*YSm* II, 100) is a later addition (see § 3).

2. The plowshare ordeal (*phāla*)

The plowshare ordeal is described in the traditions of *Smṛtis* and *Purāṇas*. Concerning *Smṛtis*, the *phāla* ordeal is mentioned in *YSm* II, 100 and then is no longer mentioned until *BSm* I, 8, 79-81 and *PSm* (*DhKo* 523). Among the *Bhāṣyakāras*, Viśvarūpa, Vijñāneśvara and Aparārka discuss it just by giving a little information (*BāYSm* II, 100; *MiYSm* II, 98, 99; *ApYSm* II, 99, 113). As for the *Purāṇas*, the *phāla* ordeal is described in *VDhPu* III, 328, 77cd-81ab and *KuKh* 44, 69cd-73ab. Lastly, a systematic description of the *phāladivya* is found in *DiTa* 302.4-312.2.

Before analyzing the texts of *Smṛtis* and *Purāṇas*, I consider the Upaniṣadic passage provided below, where an archaic procedure is described within a proto-judicial context (*ChUp* 6, 16, 1-2):

*puruṣaṃ somyota hastagrhitam ānayanti | apāhārṣīt⁹ steyam akārṣīt paraśum asmai tapateti |
sa yadi tasya kartā bhavati tata evāṅṛtam ātmānaṃ kurute | so 'ṅṛtābhisaṃdho 'ṅṛtenātmānam
antardhāya paraśum taptam pratigṛhṇāti | sa dahyate | atha hanyate || 1 ||*

*atha yadi tasyākartā bhavati | tata eva satyam ātmānaṃ kurute | sa satyābhisandhaḥ
satyenātmānam antardhāya paraśum taptam pratigṛhṇāti | sa na dahyate | atha mucyate || 2 ||*

|| 1 || O Somya, [people] lead a handcuffed man [saying]: “He has stolen, he has committed a theft! Heat an ax for him!” If he is guilty of this, he thence becomes himself lie indeed. If he tells falsehood and conceals himself under falsehood, he holds the heated ax, gets burned, and then is killed.

|| 2 || But if he is not guilty of this, he thence becomes himself truth indeed. If he tells the truth and conceals himself under the truth, he holds the heated ax, does not get burned, and then is released.

Kane (1946: 375) considers the procedure described in *ChUp* 6, 16 as the plowshare ordeal, but I cannot entirely agree. The *ChUp* does not mention a plowshare (*phāla*) but an ax (*paraśu*)¹⁰, and the defendant should touch it and not lick it. Therefore, no mention of the *phāla* ordeal occurs in the Upaniṣadic passage above. It is possible to assume that the procedure of the heated ax is an ancient practice used to establish the defendant's guilt or innocence like the later ordeals. I partially agree with Olivelle's assumption (1998: 563), according to which the procedure mentioned here refers to the fire ordeal. I suggest that the *ChUp* does not relate to the *agnidivya* itself but to a prodromic procedure from which the fire ordeal originated.

⁹ Olivelle (1998: 256) chose the variant reading *apahārṣīt* instead of *apāhārṣīt* (see, e.g., Radhakrishnan 1953: 466). Since it is an aorist from *apa-hr*, the regular form is *apāhārṣīt*, which I put in the text. I would like to thank the anonymous reviewer for making me notice it.

¹⁰ Due to this, Edgerton (1915: 245-246) refers to the procedure here described as the «ordeal of the heated ax».

The first author to refer to the *phāladivya* is Yājñavalkya (375-415 CE approx.)¹¹, who mentions it at the beginning of the section on ordeals (*YSm* II, 98-117). Below I quote the first verses of the ordeal section (*YSm* II, 98-102):

tulāgnyāpo viṣaṃ kośo divyānīha viśuddhaye |
mahābhiyogeṣv etāni śīrṣakasthe 'bhiyoktari || 98 ||

rucyā vānyataraḥ kuryād itaro vartayec chirah |
vināpi śīrṣakāt kuryād rājadrohe 'tha pātaka || 99 ||

nāsahasraparam phālam na tulā na viṣaṃ tathā |
nṛpārtheṣv abhiyogeṣu ca vaheyuḥ śucayaḥ sadā || 100 ||

sahasrārthe tulādīni kośam alpe 'pi kārayet |
pañcāśad dāpayec chuddham aśuddho daṇḍabhāg bhavet || 101 ||

sacelasnātam āhūya sūryodaya upoṣitam |
kārayet sarvadivyaṇi nṛpabrāhmaṇasaṃnidhau || 102 ||

|| 98 || Scale, fire and water, poison, and a sacred libation, all are here the ordeals aimed at testing the innocence¹² [of one of the two parties]. These [are administered] for great accusations [to the defendant] when the accuser accepts the punishment [if the defendant is found innocent after undergoing an ordeal¹³].

|| 99 || Or rather, at will, the one may undergo [an ordeal], while the other should accept to be punished. One should undergo [an ordeal] even without a previous agreement in cases that regard treachery against the king or a sin that causes the loss of caste.

|| 100 || When [the amount] is less than one thousand [*paṇas*], [the ordeals of] plowshare, scale, and poison [should not be administered], and, in the case of accusations regarding the king's properties, [they] should undergo [an ordeal] always after purifying [themselves].

|| 101 || When the amount is one thousand [*paṇas*], [he should administer] the scale ordeal and so on, whereas he should administer the sacred libation if [the amount] is low. He should make [a man judged] innocent pay fifty [*paṇas*], while [the one judged] guilty should undergo punishment.

|| 102 || At dawn, after summoning [the defendant], bathed and clothed, after a fasting period, he should administer all the ordeals in front of the king and *brāhmaṇas*.

In this context, the plowshare ordeal is mentioned in *YSm* II, 100 to teach that it should not be administered along with scale and poison ordeals in case of a judicial amount of less than one thousand *paṇas*. There is no description of the procedure of the *phāladivya* in the rest of the section, nor is the latter mentioned in the list of ordeals provided in *YSm* II, 98.

The three commentators on the *YSm* (*BāYSm*, *MiYSm*, *ApYSm*) contribute to understanding this passage, albeit the reference to the *phāladivya* is minimal. Viśvarūpa comments on the verse as follows: *sahasrād arvāṇ na phālādīni syuḥ sahasrād arvāg eṣām apravr̥t̥tiḥ |* (*BāYSm* II, 100)¹⁴. Aparārka comments on it with these words:

¹¹ See Olivelle (2019: viii-xv); Olivelle (2020: 6-7).

¹² The literal translation of *viśuddhi* (as well as that of *śuddhi*) is 'purification'. It should be remarked that the ordeal procedure was originally envisioned as a pragmatic and almost religious act of purification rather than as a pure legal action aimed at proving the truth of the innocence claimed by the defendant. However, it is undeniable that the legal aspect diachronically prevailed and that, especially in the *Dharmaśāstra*, ordeals were intended more as a legal device rather than a religious act.

¹³ The terms *śīras* and *śīrṣaka* refer to the agreement, usually sanctioned by the accuser, according to which he should undergo punishment if the opposing litigant is found innocent after undergoing an ordeal (see Olivelle 2015: 381-383). For an overview of this institution, cf. Lariviere (1984).

¹⁴ *BāYSm* II, 100: 'When the amount is less than one thousand, the ordeals of *phāla* and the others could not take place. When the amount is less than one thousand, [it is] not [possible] to proceed with these.'

*tāmrikapaṇasahasraprabhrtivivāde divyāni kārayitavyāni | na punaḥ sahasrād ūnasamkhyākapaṇaviṣayavivāde | (ApYSm II, 99¹⁵). In another section, he explains the *phāla* procedure, citing *BSm* I, 8, 79¹⁶. At last, Vijñāneśvara refers to the *phāladvīya* many times. Firstly, he comments on the verse saying as follows (*MiYSm* II, 99ab):*

paṇasahasrād arvāk phālaṃ viṣaṃ tulāṃ vā na kārayet | madhyavarti jalam api | yathoktam

tulādīni viśāntāni guruṣv artheṣu dāpayet | iti | [= DhKo 471]

atra kośasyāgrahaṇaṃ kośam alpe 'pi dāpayet ity alpābhiyoge 'pi tasya smaraṇāt | etāni catvāri divyāni paṇasahasrād ūrdhvam eva bhavanti nārvāg ity arthaḥ ||

When [the amount] is less than one thousand *paṇas*, he should not administer [the ordeals of] plowshare, poison, or scale. Among these, there is also the water [ordeal], as it is said:

“He should assign [the ordeals] that begin with the scale and end with the poison in the case of greater lawsuits.” [= DhKo 471]

In this case, [the ordeal of] sacred libation is not meant. “Besides, he should assign [the ordeal of] sacred libation in the case of a minor [lawsuit].” It [is assigned] in the case of a minor accusation, according to *Smṛtis*. These four ordeals take place only when [the amount is] more than one thousand *paṇas*, not less: this is the meaning.

Since Vijñāneśvara substitutes the fire ordeal with the plowshare one, scholars assume that the commentator considers the *phāla* ordeal as a doublet of the fire one¹⁷, although they are two distinct ordeals with two different procedures. This position would be Vijñāneśvara’s attempt to explain the text he is commenting on, but there are no clues in the *YSm* to conjecture that the plowshare ordeal is a duplicate of the fire ordeal¹⁸. As will be seen later, the two procedures have little in common apart from the *mantra* and the heating step.

The nine ordeals are divided into two groups: five of them form the group of *tulādīni*¹⁹, whereas the remaining four form the group of *tanḍulādīni*²⁰. In *MiYSm* II, 113,

¹⁵ *ApYSm* II, 99: ‘The ordeal should be administered in a lawsuit whose amount is more than one thousand coppery *paṇas*. They should not [be administered] in a lawsuit whose object amounts to less than one thousand [coppery *paṇas*].’

¹⁶ *ApYSm* II, 113: *atha phālavidhiḥ | tatra brhaspatiḥ | āyasaṃ dvādaśapalaṃ ghaṭitaṃ phālaṃ ucyate | adagdhaś cec chuddhim iyād anyathā tv apahīyate* [= *BSm* I, 8, 79] || ‘Now, the rule of the plowshare ordeal [is explained]. In this regard, Brhaspati [says]: “The plowshare is said to be made of iron [and to weight] twelve *palas*. If [the defendant] is not burnt, he will reach exculpation. Otherwise, he is excluded [from exculpation] indeed.”’

¹⁷ Cf. Pendse (1974: 318-319); Lariviere (1981: 48); Olivelle (2019: 336).

¹⁸ Yājñavalkya’s description of the fire ordeal (*YSm* II, 107-111) does not refer to the plowshare but to a red-hot ball (*agnivarnaṃ [...] piṇḍaṃ*), weighing fifty *palas* (*pañcāśat palikaṃ*). The procedure itself is also different. Before the trial, the defendant’s hands should be scratched with unhusked rice (*karau vimṛditavrīher lakṣayitvā*). Seven pipal leaves (*saptāśvatthasya patrāṇi*) should be placed on them and should be bound with a string (*YSm* II, 107). Then, after uttering a *mantra*, the man should take the red-hot ball with both hands and saunter across seven circles (*saptaiva maṇḍalāni*) drawn in the ground (*YSm* II, 108-110). After that, his hands should be scratched with unhusked rice. If the man is not burnt, he will be declared innocent (*adagdhaḥ śuddhim āpnuyāt*). Furthermore, if the ball falls or there is any doubt, the man should cross the circles again (*YSm* II, 111).

¹⁹ *MiYSm* II, 95ab: *tulādīni kośāntāni pañca divyāniha dharmasāstre viśuddhaye samdigdhasyārthasya samdehanivṛttaye dātavyānīti* || ‘[The group of] five ordeals that begins with scale and ends with sacred libation is to be given here for the resolution of a dubious case and the cessation of uncertainties according to the *Dharmasāstra*.’

²⁰ *MiYSm* II, 95ab: *nanu anyatrānyāny api tanḍulādīni divyāni santi, dhaṭo 'gnir udakaṃ caiva viṣaṃ kośas tathaiva ca | tanḍulāś caiva divyāni saptamas taptamāśakaḥ* || [= *DhKo* 462; ≈ *BSm* I, 8, 3] *iti pitāmahasmarāṇāt* | ‘However, elsewhere there is also another [group of] ordeals, that begins with the ordeal of rice grains. “Scale, fire, water, poison, sacred libation, and rice grains are ordeals. The red-hot gold is the seventh [ordeal].” This is cited from the *Smṛti* of Pitāmaha.’

Vijñāneśvara explains the procedure of *taṇḍulādīni* except for the *phāla*. Due to this dropping, Pendse (1974: 319) conjectures that «it was not considered as a distinct method, but was identified more or less with the fire ordeal». If so, this is how Vijñāneśvara explains such a strange presence of the *phāladivya* in Yājñavalkya's ordeal treatment. However, although it is clear that, at least in *MiYSm* II 99ab, *phāla* is intended as *agni* by Vijñāneśvara, there is another interesting mention of the *phāla* in his commentary: *agnih phālas taptamāśaś ca kṣatriyasya* | (*MiYSm* II, 98)²¹. I believe that, in the latter case, Vijñāneśvara considers the *phāla* ordeal as an independent procedure, distinct from the fire ordeal, as both are mentioned side by side.

The absence of a description of the *phāladivya* in *MiYSm* II, 113 may be related to the *Smṛti* source mentioned by Vijñāneśvara. Concerning the group of *taṇḍulādīni*, he quotes only Pitāmaha's verses (*PSm* 163-68 for *kośa*; *PSm* 170-180 for *taṇḍula*; *PSm* 181-189 for *dharmādharma*). Since the *PSm* is reconstructed through later quotations, the original description of the plowshare ordeal is lost, and only a slight reference to it is retained in *DiTa* 306 (= *DhKo* 523) (Scriba 1902: 16). Although no other commentator or digester cites the latter's section on the plowshare ordeal, there should have certainly been more verses on it. Therefore, it may be assumed that the version of the *PSm* used by Vijñāneśvara misses the section on the *phāladivya*. Bṛhaspati, i.e., the only *Smṛtikāra* whose description of the plowshare ordeal is preserved (*BSm* I, 8, 79-81), is not mentioned as a *Smṛti* source by Vijñāneśvara in the entire section concerning ordeals.

After a long time from the *YSm*, the *phāla* ordeal is mentioned and, for the first time, also described by Bṛhaspati²², whose original text is not preserved and was reconstructed through later quotations by Aiyangar (1941). In his list, the *phāladivya* is the eighth to be discussed among nine ordeals. These verses are mentioned in most *Nibandhas*, and, due to this, they seem to be the only verses devoted to the plowshare ordeal by Bṛhaspati (Lariviere 1981: 49). I here quote the text (*BSm* I, 8, 79-81):

āyasaṃ dvādaśapalaṃ ghaṭitaṃ phālaṃ ucyate |
adaghaś cec chuddhim iyād anyathā tv apahīyate || 79 ||

aṣṭāṅgulaṃ bhaved dīrghaṃ caturaṅgulavistr̥tam |
agnivarṇaṃ tu tac coro jihvayā lehayet²³ sakṛt |
na daghaś cec chuddhim iyād anyathā tu sa hīyate || 80 ||

gocarasya pradātavyaṃ sabhyaiḥ phālaṃ prayatnataḥ |
mahābhīyogeṣv etāni śīrṣakasthe 'bhiyoktari || 81 || [= YSm II, 98cd]

|| 79 || The plowshare is said to be made of iron [and to weight] twelve *palas*. If [the defendant] is not burnt, he will reach exculpation. Otherwise, he is excluded [from exculpation] indeed.

|| 80 || [The plowshare] should be eight *āṅgulas* long and four *āṅgulas* deep. A thief should be made to lick it once with his tongue, while it is red-hot. If he is not burnt, he will reach exculpation. Otherwise, he is excluded [from exculpation] indeed.

|| 81 || The court officials should diligently administer the plowshare ordeal only to cow thieves — these [are administered] in the case of greater lawsuits to the defendant after the agreement to undergo punishment [= *YSm* II, 98cd].

Even though the reconstructed text presents some problems²⁴, this is the most comprehensive description of the *phāla* ordeal found in the *Smṛtis*. This peculiar ordeal

²¹ *MiYSm* II, 98: 'The ordeals of fire, plowshare and red-hot gold are proper to *kṣatriyas*.'

²² For the date of the *BSm*, see § 3.

²³ I emend the irregular reading *lelihet* (see Aiyangar 1941: 92) to *lehayet* (cf., e.g., *KKT* 253; *SmC* 279; *DiTa* 304).

²⁴ For instance, see the similarity between *BSm* I, 8, 79cd and *BSm* I, 8, 80ef.

is assigned only to cow thieves (*BSm* I, 8, 81ab = *BSm* I, 8, 31cd). The procedure consists in licking a red-hot piece of iron to see whether the tongue burns or not.

The next author to mention the plowshare ordeal is Pitāmaha²⁵, whose text was reconstructed by Scriba (1902). However, his mention of this procedure is only found in Raghunandana's *Divyatattva* (1510-1580 approx.)²⁶, i.e., a compendium on the ordeal procedure and the most complete source about it. Such a text is essential to reconstruct not only the ordeal procedure itself but also parts of lost *Smṛtis*²⁷. Like the other *Nibandhakāras*, Raghunandana overtly quotes his sources, mentioning more than forty works, allowing the recollection of lost verses²⁸. Despite its completeness, the *Divyatattva* includes a small section about the *phāla* ordeal (*DiTa* 302.4-312.2). In the first part (*DiTa* 302.4-306.1), Raghunandana quotes verses from previous works (*BSm* I, 8, 79ab; *BSm* I, 8, 80; *BSm* I, 8, 81ab; *VyCi* 660). One of these verses is ascribed to Pitāmaha, and, according to him, both the judge and the defendant should employ such a verse as a *mantra* to invoke the fire (*DhKo* 523):

āyasaṃ lelihānasya jihvayāpi samādiśet

O Iron, indicate through the tongue of the one who is licking (tr. Lariviere 1981: 215).

Then, the procedure is explained (*DiTa* 306.2-306.4). An iron plowshare that weights twenty-four *tolakas* and measures eight *aṅgulas* in length should be made incandescent. After invoking the *Dharma* and distributing the honorarium, the chief judge should invoke the fire in the plowshare with the same *mantras* used to invoke the fire (*DiTa* 307-311.1 = *PSm* 123-127). After that, the defendant should invoke the heated plowshare (*DiTa* 312.1 = *YSm* II, 108). Finally, he should lick it, and he is declared innocent if its tongue is not burnt (*DiTa* 312.1-2).

Raghunandana's description is the most detailed among all the texts considered, but the procedure here described is probably not the same as that known by Bṛhaspati, as some centuries have passed. Other features of the *phāladivya* could be found in the Purāṇic tradition. The *Viṣṇudharmottara-purāṇa* (600-1000 CE approx.)²⁹ devotes a section to the ordeal procedure (*VDhPu* III, 328), where the *phāla* ordeal is also described. Unfortunately, the text is partly damaged due to its bad transmission³⁰. However, part of the text can be reconstructed through a later text, the *Kumārikā-khaṇḍa*, which employs the *Viṣṇudharmottara-purāṇa* as a source. The *Kumārikā-khaṇḍa*³¹ (approximately dated to the period between the sixteenth and the seventeenth centuries for the extant version)³² also dedicates a chapter to the ordeal treatment (*KuKh* 44), which includes a description of the *phāladivya*. As customary for *Purāṇas*, the authors incorporate textual passages from other works without citing their source³³. Given the similarities between the two passages, it is evident that the *Kumārikā-khaṇḍa* depends on the *Viṣṇudharmottara-purāṇa*, at least as concerns the chapter on ordeals. In turn, the *Viṣṇudharmottara-purāṇa* may have appropriated the text from a source (maybe a *Smṛti*) that contained an eightfold

²⁵ For the date of the *PSm*, see note 54.

²⁶ See Kane (1975: 897); Lariviere (1981: 56-58).

²⁷ For instance, Scriba (1902: 3-5) reconstructs most of the *PSm* thanks to the 145 citations found in the *Divyatattva*.

²⁸ See Lariviere (1981: 232-233).

²⁹ See Kane (1962: 910); Inden (2000: 93). For other date hypotheses, cf. Rocher (1986: 250-252).

³⁰ See Hazra (1958: 156-157).

³¹ The *Kumārikā-khaṇḍa* is part of the *Māheśvara-khaṇḍa* that is considered the first *khaṇḍa* of the printed *Skanda-purāṇa* (see Hazra 1940: 157-166), which is distinct from the original one (see Adriaensen, Bakker, Isaacson 1998: 3-56). Therefore, the *Kumārikā-khaṇḍa* should be considered an independent work, ascribed to the *Skanda-purāṇa* only after its composition.

³² See Mehta (1965: 41-45); Desai (1978: 34-36).

³³ See De Simini (2020: 267).

description of ordeals³⁴. Here, I provide the two parallel texts to highlight analogies and differences (*VDhPu* III, 328, 77cd-81ab; *KuKh* 44, 69cd-73ab):

<i>VDhPu</i>	<i>KuKh</i>
<i>phālaśuddhiṃ pravakṣyāmi śṛṇudhvaṃ dvijapuṅgavāḥ</i> 77	<i>phālaśuddhiṃ pravakṣyāmi tāṃ śṛṇu tvam dhananājaya</i> 69
<i>āyasaṃ dvādaśapalaṃ ghaṭitaṃ phālam ucyate aṣṭāṅgulaṃ samaṃ dīrghaṃ caturāṅgulavistr̥tam</i> 78	<i>āyasaṃ dvādaśapalaṃ ghaṭitaṃ phālam ucyate aṣṭāṅgulaṃ adīrghaṃ ca caturāṅgulavistr̥tam</i> 70
<i>vahnyuktaṃ³⁵ vinyaset patraṃ abhiśastasya mūrdhani triḥ parāvartayeḥ jihvāṃ lihatas sārddham aṅgulaṃ</i> 79	<i>vahnyuktaṃ vinyasen mantraṃ abhiśastasya mūrdhani triḥ parāvartayeḥ jihvāṃ lihatas³⁷ asmāt ṣaḍaṅgulaṃ</i> 71
<i>gavāṃ kṣīraṃ pradātavyaṃ jihvāsodhanam uttamam jihvāparikṣaṇaṃ kuryād dagdhā³⁶ cen na vibhāvyaṭe</i> 80	<i>gavāṃ kṣīraṃ pradātavyaṃ jihvāsodhanam uttamam jihvāparikṣaṇaṃ kuryād dagdhā cen na vimocyate</i> 72
<i>taṃ viśuddhaṃ vijānīyād viśuddhaṃ caiva mokṣayet</i> 81ab	<i>taṃ viśuddhaṃ vijānīyād viśuddhā cet tu jāyate</i> 73ab

|| 77 || I will explain the exculpation through the plowshare ordeal. You, o best of twice-borns, listen.

|| 69 || I will explain the exculpation through the plowshare ordeal. You, o Victorious, listen to it.

|| 78 || The plowshare is said to be made of iron, [and] to be of twelve *palas* [in weight], of eight *aṅgulas* [in height], of the same in length, [and] of four *aṅgulas* in width.

|| 70 || The plowshare is said to be made of iron, [and] to be of twelve *palas* [in weight], of eight *aṅgulas* [in height], and not long, [and] of four *aṅgulas* in width.

|| 79 || He should place a leaf [with the *mantra*³⁸] uttered* [in the case of the ordeal] of fire on the defendant's head. He should make the tongue of the one who licks turn three times on [a section of the plowshare of] one *aṅgula* and a half.

|| 71 || He should place [a leaf with] the *mantra* uttered [in the case of the ordeal] of fire on the defendant's head. He should make the tongue [of the defendant] turn three times on [a section of the plowshare of] six *aṅgulas*.

|| 80 || Cow milk should be used as an excellent [means] for cleaning the tongue. He should examine the tongue: if it does not appear burnt,

|| 72 || Cow milk should be used as an excellent [means] for cleaning the tongue. He should examine the tongue: if it is burned, [the defendant] is not released;

³⁴ The chapter on the ordeals of the *VDhPu* describes eight ordeals, as *VDhPu* III, 328, 6 declares: *koṣaṃ dhaṭaṃ viṣaṃ cāgṇim udakaṃ taptamāśakam | phālaṃ ca taṇḍulaṃ caiva divyāny aṣṭau vidur budhāḥ* || 'The sacred libation, scale, poison, fire, water, red-hot gold, plowshare, and rice grains: the sages know eight ordeals.' The same verse is found within two Nepalese manuscripts of the *NSm* (i.e., B3 and B4), which contain – at the end of them – a compilation of one hundred and ten verses about ordeals attributed to Pitāmaha (see Lariviere 1985). After the latter compilation, there are five other verses concerning ordeals that are attributed to the *Dharmaśāstra*, without specifying the source (*śri dharmasāstre śuddhāsuddhiparaṃ samāptam iti*), and the first of these verses coincides with *VDhPu* III, 328, 6, of which I quote the text as it is in the manuscripts: *koṣaṃ dhaṭaṃ viṣaṃ cāgṇim udakaṃ taptamāśakam | phalaṃ ca taṇḍulaṃ caiva divyāni aṣṭau vidur budhāḥ* || (see Lariviere 1985: 130). This factor (even if not decisive) may be used to suppose that the source of *VDhPu* III, 328 was a lost *Smṛti* containing the description of eight ordeals. Since this hypothesis needs further investigation, I delay its expansion to a subsequent work of mine.

³⁵ I emend *vahnyaktaṃ* 'smeared with fire' to *vahnyuktaṃ*, as it is in *KuKh* 44, 71a.

³⁶ I emend *dagdhām* (acc.) to *dagdhā* (nom.), as it is in *KuKh* 44, 72d.

³⁷ I emend *lihatann* (nom.) to *lihatas* (gen.), as it is in *VDhPu* III, 328, 79d. If it were a nominative, the participle would refer to the authority administering the ordeal procedure (i.e., the king or the chief judge) that is the only inferred subject possible to the predicate *parāvartayet* (a causative form of *parāvṛt*). If so, the king or the chief judge would be the one licking the plowshare, making the verse no sense. The genitive, found in *VDhPu* III, 328, 79d, rightly refers to the defendant undergoing the ordeal and consequently licking the plowshare.

³⁸ I decided not to emend *patraṃ* 'leaf' of *VDhPu* III, 328, 79a or *mantraṃ* of *KuKh* 44, 71a, as my interpretation of this verse derives from the inference of both terms.

|| 81 || he should declare him innocent and, as innocent, he should set him free.

|| 73 || if it is clean, he should declare him innocent.

In addition to the description of the procedure itself, the *phāla* ordeal is mentioned another time in a miscellaneous section placed at the beginning of the ordeal chapter (*VDhPu* III, 328, 17; *KuKh* 44, 18cd-19):

*na śīte tu dhaṭam deyam uṣṇakāle
hutāśanam |
varṇinām na tathā phālam taṇḍulam
mukharogiṇām || 17 ||*

*na pravāte dhaṭam deyam noṣṇakāle
hutāśanam || 18 ||
varṇinām ca tathā phālam³⁹ taṇḍulam⁴⁰
mukharogiṇām || 19 ||*

|| 17 || The scale [ordeal] should not be administered in the cool season, nor the fire [one] in the hot season. In like manner, the plowshare [ordeal] [should not be administered] to the religious students nor [the ordeal of] rice grains [should be administered] to people who suffer from a sore throat.

|| 18 || The scale [ordeal] should not be administered in a windy place, nor the fire [one] in the hot season.

|| 19 || And likewise, the plowshare [ordeal*] [should not be administered] to the religious students nor [the ordeal of] rice grains* [should be administered] to people who suffer from a sore throat.

Besides some philological problems, the descriptions of both texts are clear, and some new procedural features are found here. In particular, thanks to these *Purāṇas*, it is possible to know that (i) the plowshare ordeal should not be assigned to the *brahmacārins*⁴¹ (*VDhPu* III, 328, 17cd; *KuKh* 44, 19), (ii) the defendant should lick a section of one *aṅgula* and a half or six *aṅgulas* of the heated plowshare (*VDhPu* III, 328, 79cd; *KuKh* 44, 71cd), (iii) the cow milk should be used to clear the defendant's tongue before his examination (*VDhPu* III, 328, 80ab; *KuKh* 44, 72ab). Furthermore, *KuKh* 44, 71ab (according to which *VDhPu* III, 328, 79ab should be emended) confirms that the *mantra* uttered for the plowshare ordeal is the same as that used to invoke the fire, as *DiTa* 307-311.1. It is difficult to indicate the exact source of this information and to establish whether it has a *Smṛti* origin or not. The reconstructed *BSm* and *PSm* do not refer to these features. However, given that their texts are reconstructed, they could have contained them before losing some verses. Alternatively, such elements may have been added by the author of *VDhPu* from other sources or may represent local usages.

³⁹ I emend the wrong reading *kālam* to *phālam*, as it is in *VDhPu* III, 328, 17c.

⁴⁰ I emend the wrong reading *tandulam* to *taṇḍulam*, as it is in *VDhPu* III, 328, 17d.

⁴¹ The term *varṇin* has the etymological meaning of 'having a particular color'. However, if used in a social context, this term could assume two meanings: a) 'a person belonging to one of the four *varṇas*'; b) 'a religious student or *brahmacārin*'. This second meaning is also recorded by Pāṇini (A 5.2.134): *varṇād brahmacāriṇi* («The *taddhita* affix *inI* occurs to denote the sense of *matUP* after syntactically related nominal stem *varṇa* when ending in nominative, provided the derivate signifies a *brahmacārin*», trans. Sharma 1999: 593). To understand the suffix *matUP*, A 5.2.94 is needed. The latter teaches that the suffix *-mat* is used to form a *taddhita* derivative with the meaning of 'endowed with'. Thus, the derivative *varṇin* literally means 'one endowed with the *varṇa*' and refers to *brahmacārin*, a member of the first of the four *āśramas*. In these passages (*VDhPu* III, 328, 17; *KuKh* 44, 19), I believe that it refers to *brahmacārins* and not to generic members of the *varṇas*. The rule according to which *phāladivya* is forbidden to all members of the *varṇas* would not fit in a lawsuit because, if so, no one could perform it. Conversely, the rule according to which *phāladivya* is forbidden just to *brahmacārins* would work because men belonging to the other *āśramas* could perform it. Therefore, I decide to follow the meaning recorded by Pāṇini. The same interpretation of *KuKh* 44, 19 is given by Tagare (1993: 412), that translates *varṇinām* as 'in the case of religious students'.

From the collected sources, it is possible to state that the information about the *phāla* ordeal is scarce, and the extant texts contain shallow descriptions. It seems that the plowshare ordeal was not so practiced, and that *Smṛtikāras*, *Bhāṣyakāras*, and *Nibandhakāras* were not familiar with its procedure; otherwise, «they would have fleshed out their discussions of the *phāladivya* with details of their own experience» (Lariviere 1981: 50). However, among the other sources on the plowshare ordeal⁴², there is also an inscription ascribed to the age of Jayakeśi III, i.e., a Kadamba king of Goa (1187/8-1212/3 CE)⁴³. This Kannaḍa inscription is dated to 1202-1203 CE (recorded as the fifteenth year of his kingdom) and has been found in a temple of Basava at Kittur (Fleet 1870: 263). It states that the *phāladivya* (kannaḍa: *pāladivya*) is used to settle a dispute concerning the possession of land⁴⁴, to which it was not destined, according to the *Smṛtis*. This inscription attests that the plowshare ordeal is also used for matters that do not imply its ordinary employment, i.e., accusations against cow thieves, as *BSm* I, 8, 81ab (= I, 8, 31cd) and *DiTa* 305.1 teach.

3. *YSm* II, 100: a later addition?

After considering all the known sources about the plowshare ordeal, it appears to be a late ordeal, added to the original five⁴⁵. In this section, I try to demonstrate that the first mention of the *phāla* ordeal in *YSm* II, 100 should be considered an interpolation to the original core of the *YSm*. In the first phase of the textual history of the *YSm*, namely between the early fifth century (i.e., the period of its composition) and the first quarter of the ninth century (i.e., the composition of Viśvarūpa's *Bālakrīḍā*, its first commentary), no manuscripts of the *YSm* are handed down as well as no citations from it are found in other works. Olivelle (2020: 41) refers to it as the 'dark period' of the textual history of the *YSm*, in which substantial modifications and additions have been operated to the original *YSm*. Although not with the same frequency, such phenomena are detectable also in the later period, as evident from the comparison between the recension of Viśvarūpa and the Vulgate⁴⁶. Looking from an overall perspective, all *Smṛtis* have undergone a process of adding verses to the original compilations. According to Lariviere (2003: 2-5), a *Smṛti* is the result of the collection of gnomic verses that experts of a certain community (*śiṣṭas*) ascribed to a mythical figure (Manu, Yājñavalkya, Bṛhaspati etc.) to bestow antiquity and authoritativeness on this collection⁴⁷. Since «the compilation of these verses into "texts" did not establish once and for all *the* text of Nārada, Bṛhaspati, etc.» (Lariviere 2003: 4),

⁴² Cf. Lariviere (1981: 49-50).

⁴³ See Moreas (1931: 203-205).

⁴⁴ See Fleet (1870: 304-309).

⁴⁵ See Pendse (1974: 318).

⁴⁶ After the composition of Viśvarūpa's *Bālakrīḍā* (ninth century), the text of the *YSm* has not been fixed at all, as emerges from the Yājñavalkya's citations made by Medhātithi, which shows common variant readings with Viśvarūpa and different ones. Subsequently, a scholar or a group of scholars composed the "Vulgate" edition of the *YSm* by the late tenth century. This edition is not yet available, but it is reconstructed through the other two main commentaries to the *YSm*, i.e., Vijñāneśvara's *Mitākṣarā* and the Aparārka's *Aparārkacandrikā* (twelfth century). Thanks to the relevance of Vijñāneśvara's *Mitākṣarā*, such a version stands as the authoritative version of the *YSm*, so that its textual variants are found not in most *Nibandhas* and manuscripts. Therefore, until the composition of the Vulgate, the text has remained fluid and undergone changes, even though commentaries have been written down. In this regard, see Olivelle (2020: 40-43).

⁴⁷ It happens that one verse is ascribed to more than one authority and is found in two or more *Smṛtis*. According to Aiyangar (1941: 145-148), there are various explanations for this: a) a common source for both *Smṛtis*; b) an "accident of composition," i.e., both composers independently use the extant sequence of words; c) copying with the omission of the source; d) a citation whose introductory verses are now lost. Such mistakes also involve *Bhāṣyakāras* and *Nibandhakāras*, who could commit errors in quotations – the latter phenomenon affects those *Smṛtis* that should be reconstructed through later citations.

the compilation of the extant *Smṛtis*' original core does not stop *śiṣṭas* to attribute other verses to the *Smṛti* authorities, thus causing the expansion of the *Smṛtis* themselves. Furthermore, although the composition of the first commentaries slackens the expansion of the *Smṛtis*, this process never stops completely⁴⁸. Over time, some scholars have tried to identify the interpolated parts of the *YSm*⁴⁹. However, due to the limited evidence, Olivelle (2020: 41) states that «some changes must have occurred, but it is impossible to identify them with certainty». I generally agree with Olivelle's assumption. Nevertheless, the spuriousness of *YSm* II, 100 is well demonstrable, as there are philological, chronological, and content issues related to the verse and the mention of the plowshare ordeal.

As for the philological issues, there are three textual versions of *YSm* II, 100 coming from the indirect tradition that partly differ between them⁵⁰:

Viśvarūpa's version (BāYSm II, 100), that was chosen by Olivelle (2020: 208-209) for the critical edition: *nāsaḥasraparaṃ phālaṃ na tulā na viṣaṃ tathā | nṛpārtheṣv abhiyogeṣu vaheyuh śucayaḥ sadā ||*

Vulgate's version (cf. MiYSm II, 99 and ApYSm II, 99): *nāsaḥasrād dharet phālaṃ na viṣaṃ na tulāṃ tathā | nṛpārtheṣv abhiśāpe ca vaheyuh śucayaḥ sadā ||*

When the amount is up to one thousand [*pañas*], he should not administer the ordeals of the plowshare, poison, and scale, and, in case of the king's properties and calumny, [men] should undergo [ordeals] after purifying [themselves].

Purāṇic version⁵¹ (*AgPu* 254, 30): *nāsaḥasrād dharet phālaṃ na tulāṃ na viṣaṃ tathā | nṛpārtheṣv abhiyogeṣu vaheyuh śucayaḥ sadā ||*

When the amount is up to one thousand [*pañas*], he should not administer the ordeals of the plowshare, scale, and poison, and, in lawsuits regarding the king's properties, [men] should undergo [ordeals] always after purifying [themselves].

Besides, *YSm* II, 100 has a different position in the Vulgate, as it is placed after *YSm* II, 103 (which grants some general rules about the ordeals of scale, fire, water, and poison⁵²). The

⁴⁸ Besides the case of the *YSm* (see note 46), such a phenomenon also involves Kalyāṇabhaṭṭa's modifications of the *NSm* and Asahāya's *Bhāṣya* (see Lariviere 2003: 15-19).

⁴⁹ Among these scholars, Losch's hypothesis is the most discussed. Since *Purāṇas* borrowed huge sections from the *YSm* (*AgPu* 252-257; *GaPu* 93-106), Losch (1927) postulated that the absence of the second *adhyāya* in the *GaPu* demonstrates that it all is a later addition to the original core of the *YSm*. Meyer (1929) refuted Losch's position since Purāṇic passages are later elaborations of *Smṛti* material. Besides them, Lingat (1973: 126) also asserts that the second *adhyāya*, repeated word by word in the *AgPu*, is a later addition, whereas Kane (1930: 175-176) affirms that there is no evidence to demonstrate an earlier version of the *YSm* than the extant text. There are two additional reasons to confute Losch's position. The *YSm* strictly follows the argumentation of the *MDh*, and the *vyavahāra* is described by Manu (*MDh* VIII, 1 – IX, 251). Therefore, it would be improbable that the original *YSm* did not contain the treatment of *vyavahāra*. Furthermore, the first *khaṇḍa* of the *Garuḍa-purāṇa* has dated approximately between the ninth and tenth centuries CE (specifically between 850 and 1000, cf. Hazra 1940: 144) or the tenth and eleventh centuries (cf. Chaudhuri, Banerjee 1930: 560). Given the outlined date of the *GaPu*, Viśvarūpa's commentary is earlier than the *GaPu* since it was composed in the early ninth century. Due to all these cases, Losch's position could be no longer valid (cf. Olivelle 2020: 7).

⁵⁰ I mark in bold the point in the texts where variant readings are recorded.

⁵¹ As Banerjee (1978) demonstrates, the author of *AgPu* 252-257 appropriates the text of the entire second *adhyāya* of the *YSm*, without indicating its source. It is not the unique case of *Dharmaśāstra* verses included in Purāṇic passages (cf. Davis 2018: 374), as the first and the third *adhyāyas* of the *YSm* are inserted in the *GaPu* (cf. Mandlik 1880: lvii-lxvii) and the first three *adhyāyas* of the *MDh* are inserted in the *BhPu* (cf. Laszlo 1971, Sternbach 1974), both without declaring their sources.

⁵² *YSm* II, 103: *tulā strībālavṛddhārtapaṅgubrāhmaṇarogiṇām | agnir jalam vāsudrasya yavāḥ sapta viṣasya vā ||* 'The scale [ordeal] is for women, children, older men, pained men, cripples, *brāhmaṇas* and

next verse (*YSm* II, 101), connected to the previous regarding the content, is omitted in the Vulgate and, in addition to six manuscripts⁵³, is reported only by Viśvarūpa (*BāYSm* II, 101) and the author of the Purāṇic version (*AP* 254, 31). In my perspective, *YSm* II, 101 may be another interpolation added to the source of the *Bālakrīḍā*, *Agni-purāṇa* and six aforementioned manuscripts to complete the information granted by *YSm* II, 100. On its part, the Vulgate did not depend on the same source and consequently do not contain such a verse.

As concerns the chronological issue, all the discussions about the plowshare ordeal within the Smṛtic tradition develop in late sources (*BSm* and *PSm*), except for *YSm* II, 100. The chronological distance between the first *Smṛti* source mentioning the *phāla* ordeal (*YSm*) and the others (*BSm* and *PSm*) is significant, as at least two or three centuries have passed⁵⁴. It sounds suspect that, after Yājñavalkya's hint, the plowshare ordeal has been ignored for at least two centuries, before being reconsidered and described by Bṛhaspati and Pitāmaha.

As for the content itself, it is suspect that Yājñavalkya mentions the *phāla* ordeal in *YSm* II, 100, but neither includes it in the previous list (*YSm* II, 98) nor describes its procedure in the following verses as the *Smṛtikāra* does with the other five ordeals⁵⁵, as Pendse (1974: 318) noticed. Two additional elements seem to be odd. Firstly, it is suspect that Nārada, Viṣṇu, Kātyāyana, and the later redactor of the *NSm* do not mention or describe the plowshare ordeal. A typical *Smṛti* feature is that once an element or a matter is introduced in an earlier *Smṛti*, it usually remains in later ones. Secondly, the frame in which the *phāladivya* is mentioned also sounds strange. In *YSm* II, 100-101, the economic evaluation of the judicial process itself is discussed to choose which ordeal to administer. It is said that the ordeals of *phāla*, *tulā*, and *viṣa* are not to be administered with a less amount than one thousand, and it is also confirmed by Vijñāneśvara⁵⁶. However, Nārada's section on ordeals does not allude to such an economic evaluation before their administration. It is only starting with Kātyāyana and Viṣṇu that the calculation of the judicial amount is again considered to assign the proper ordeal (*VSm* IX, 4-11; *KSm* 416-421). Furthermore, notwithstanding a reference to such amount is included, the *phāla* ordeal is not mentioned in these last two works. As said above, the subsequent references to the plowshare ordeal are found only in the *BSm* and *PSm*, where the amount of the judicial process is also considered (*BSm* I, 8, 8-11; *PSm* 47). As well as the two-century absence of reference to the plowshare ordeal, these content-related elements seem to be suspect.

In conclusion, an interpolation may well be conjectured, and I believe it could concern both *YSm* II, 100 and the following *YSm* II, 101. Considering Viśvarūpa's version, *YSm* II, 100-101 could have been easily added between the list of the ordeals and the discussion on the agreement established before their administration (*YSm* II, 98-99) and the general rules

diseased men. The fire or water [ordeals] are for a non-*sūdra*; or rather, seven grains of poison [are for a *sūdra*].’ For the interpretation of the verse, see Olivelle (2020: 209-210).

⁵³ The six manuscripts are mTr1, mTr2, mTr3, mTr5, mTr6, and mTr7.

⁵⁴ The *YSm* is placed around the early fifth century by Olivelle (2019: viii-xv). The dates of the *BSm* and *PSm* should be reconsidered. Kane puts the *BSm* between 200 and 400 CE (cf. Kane 1930: 209-211), later than the *YSm* (100 BCE – 300 CE; cf. Kane 1930: 183-185) and the *NSm* (100-300 CE; cf. Kane 1930: 204-207) and earlier than the *KSm* (300-600 CE; Kane 1933: xv-xvii). Although Kane's date hypotheses are no more valid, the chronological distance between the works could be maintained and moved forward. Since the *NSm* is now placed between the fifth and sixth centuries by Olivelle (2018: 28), Bṛhaspati's text should be put at least between the sixth and seventh centuries, as Jolly states (1889: 276). Likewise, as Scriba (1902) does not assume a date, the only date proposal is Kane's (1930: 226-227), which considers the *PSm* later than the *BSm*, placing it between the fourth and seventh centuries. Adapting it to the reconsidered date of the *BSm*, Pitāmaha's text should hypothetically be placed after the seventh century.

⁵⁵ The following verses are dedicated to the five canonical ordeals: *YSm* II, 103-106 to the scale (*tulā*); *YSm* II, 107-111 to the fire (*agni*); *YSm* II, 112-113 to the water (*āpas/jala*); *YSm* II, 114-115 to the poison (*viṣa*); *YSm* II, 116-117 to the sacred libation (*kośa*).

⁵⁶ *MiYSm* II, 99ab: *nāśahasrād dharet phālam ity atra tu tāmrikapaṇasahasraṃ boddhavyam* || “He should not administer the plowshare ordeal, when the amount is up to one thousand [*paṇas*],” here an amount of one thousand coppery *paṇas* should be inferred indeed.’

about their conduction (*YSm* II, 102). I assume that these verses have been added to the ordeal section during the “dark period” mentioned above, only after the *phāla* ordeal had been included in the “canonical” list of ordeals (see *BSm* I, 8, 3-4). As shown in § 2, the term *phāla* of *YSm* II, 100 has been sometimes commented on as a label referring to the fire ordeal. Thus, its insertion into Yājñavalkya’s original core may aim at bestowing authoritativeness on the plowshare ordeal that, as part of the *taṇḍulādīni* (‘canonized’ after the Gupta period), had less authoritativeness than the older *tulādīni*. The commentators have not identified such addition and, among them, only Vijñāneśvara deals with the mysterious *phāla* ordeal, although he seems to have little information about it.

4. Conclusion

In this paper, I have tried to demonstrate that the first mention of the *phāla* ordeal in *Yājñavalkya-smṛti* (*YSm* II, 100) is probably due to interpolation to the original core of the text. Regarding the sections on ordeals, once an element is introduced in an earlier text, it is generally found in the subsequent ones (see § 1). However, it does not occur in the case of the plowshare ordeal. It is mentioned (but not described) in the *YSm*, but absent in the later *NSm*, *VSm*, and *KSm*. After them, a description is provided by the *BSm* and probably the *PSm*. Many centuries later, the *DiTa* presents the most detailed treatment of it. The information about the *phāladivya* is scarce, and other procedural features can be found in the Purāṇic tradition (*VDhPu*, *KuKh*) and other kinds of sources, such as epigraphical ones (see § 2). Therefore, its first mention in *YSm* II, 100 is suspect due to philological, chronological, and content issues. Yājñavalkya’s text omits the *phāladivya* in his initial list of ordeals, in which he quotes just five of them, not six. Furthermore, he does not describe the plowshare ordeal as he does for the other five. Moreover, it is suspect that, for at least two centuries, the *phāla* ordeal has been ignored by the authors of *Smṛtis* (*NSm*, *VSm*, *KSm*, and the late redactor of the *NSm*) and then reconsidered by late *Smṛtikāras* (*BSm* and *PSm*), that placed it in the eighth place of the ordeal list. An interpolation to the original core of the *YSm* may be explained by the oral expansion of the *Smṛtis* between the age of composition and that of the first commentaries (see § 3).

List of abbreviations

<i>A</i>	Pāṇini’s <i>Aṣṭādhyāyī</i>
<i>AgPu</i>	<i>Agni-purāṇa</i>
<i>ĀpDh</i>	<i>Āpastamba-dharmasūtra</i>
<i>ApYSm</i>	Aparārka’s <i>Aparārka-candrikā</i> , commentary on the <i>Yājñavalkya-smṛti</i>
<i>AVŚ</i>	<i>Atharvaveda</i> (Śaunakīya Recension)
<i>BāYSm</i>	Viśvarūpa’s <i>Bālakrīḍā</i> , commentary on the <i>Yājñavalkya-smṛti</i>
<i>BhPu</i>	<i>Bhaviṣya-purāṇa</i>
<i>BSm</i>	<i>Bṛhaspati-smṛti</i>
<i>ChUp</i>	<i>Chāndogya-upaniṣad</i>
<i>DhKo</i>	<i>Dharmakośa</i>
<i>DiTa</i>	Raghunandana’s <i>Divyatattva</i>
<i>GaPu</i>	<i>Garuḍa-purāṇa</i>
<i>GDh</i>	<i>Gautama-dharmasūtra</i>
<i>JB</i>	<i>Jaiminīya-brāhmaṇa</i>
<i>KKT</i>	Lakṣmīdhara’s <i>Kṛtyakalpataru</i>
<i>KSm</i>	<i>Kātyāyana-smṛti</i>

<i>KuKh</i>	<i>Kumārikā-khaṇḍa</i> (part of the <i>Māheśvara-khaṇḍa</i>) of the printed <i>Skanda-purāna</i>
<i>MDh</i>	<i>Mānava-dharmaśāstra</i>
<i>MiYSm</i>	Vijñāneśvara's <i>Mītākṣarā</i> , commentary on the <i>Yājñavalkya-smṛti</i>
<i>NSm</i>	<i>Nārada-smṛti</i>
<i>PB</i>	<i>Pañcaviṃśa-brāhmaṇa</i>
<i>ṚV</i>	<i>Ṛgveda</i>
<i>SmC</i>	Devanabhata's <i>Smṛticandrikā</i>
<i>VDhPu</i>	<i>Viṣṇudharmottara-purāna</i>
<i>VSm</i>	<i>Viṣṇu-smṛti</i>
<i>YSm</i>	<i>Yājñavalkya-smṛti</i>

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<i>ĀpDh</i>	Olivelle, Patrick (ed.) (2000), <i>Dharmasūtras. The Law Codes of Āpastamba, Gautama, Baudhāyana and Vasiṣṭha</i> , Delhi, Motilal Banarsidass.
<i>ApYSm</i>	Ānandāśrama Pandits; Hari Nārāyaṇa Āpate (eds.) (1903), <i>Aparārka, commentary on the Yājñavalkya-dharmaśāstra</i> , Poona, Ānandāśrama.
<i>AVŚ</i>	Roth, Rudolf von; Whitney, William Dwight (eds.) (1856), <i>Atharva Veda Sanhita</i> , Berlin, Ferdinand Dümmler.
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<i>ChUp</i>	Olivelle, Patrick (ed.) (1998), <i>The Early Upaniṣads. Annotated text and translation</i> , New York-Oxford, Oxford University Press.
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<i>GaPu</i>	Rājendranātha, Śarman (ed.) (1984), <i>The Garuḍamahāpurāṇam</i> , Delhi, Nag Publishers [= Veṅkaṭeśvara Press edition 1906].
<i>GDh</i>	Olivelle, Patrick (ed.) (2000), <i>Dharmasūtras. The Law Codes of Āpastamba, Gautama, Baudhāyana and Vasiṣṭha</i> , Delhi, Motilal Banarsidass.
<i>JB</i>	Vira, Raghu; Chandra, Lokesh (eds.) (1954), <i>Jaiminīya Brāhmaṇa of the Samaveda</i> , Nagpur, Arya Bharati Press.
<i>KKT</i>	Aiyangar, Kumbakonam Viraraghava Rangaswami (ed.) (1941-1953), <i>Kṛtyakalpataru of Lakṣmīdhara</i> , Baroda, Oriental Institute.
<i>KuKh</i>	Kṣemarāja, Śrīkrṣṇadāsa (ed.) (1910) [1867], <i>Śrīskandapurāṇam</i> , Bombay, Veṅkaṭeśvara Press.

- KSm* Kane, Pandurang Vaman (ed.) (1933), *Kātyāyana-smṛti on vyavahāra (Law and Procedure). Text (reconstructed), Translation, Notes and Introduction*, Poona, Aryasamskṛti Press.
- MDh* Olivelle, Patrick (ed.) (2005), *Manu's Code of Law. A critical edition and translation of the Mānavadharmasāstra*, New York, Oxford University Press.
- MiYSm* Wāsudev Laxman Śāstrī Paṅśikār (ed.) (1936), *Yājñavalkya-smṛti, with the Commentary Mītākṣarā of Vijñāneśvara*, Bombay, Nirnaya Sagar Press.
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