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לעילוי נשמת ר' יצחק מאיר בן אליהו ובריינא בת אברהם ע"ה ור' גדליה בן אברהם מנחם הכהן ומרים בת ישראל ע"ה

The Laws of *Challah* Part 2

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What types of grain are obligated in challah?

Can different doughs combine to meet the requisite amount for the challah obligation?

A previous article, the Laws of Challah Part 1, focused on the basic obligation of *challah*, how it should be handled and how much flour is obligated in *challah*. This article will focus on what types of grain are obligated in *challah* and combining different doughs to create the requisite *shiur* needed for the *challah* obligation.

What type of grain is obligated in *challah*?: The Mishna (Challah 1:1) teaches that five species of grain - wheat, barley, spelt, oats and rye¹ - are obligated in the mitzvah of *challah* when the proper *shiur* (amount) of flour is present². The Mishna continues that the different species combine for the necessary *shiur* to be obligated in the mitzvah of *challah*.

This Mishna contradicts a later Mishna (Challah 4:2) that limits which of the Five Grains combine with each other. The Mishna there teaches that wheat combines only with spelt (which is halachically regarded as a subspecies of wheat), while barley combines with all of the other species except for wheat (as rye and oats are considered subspecies of barley; spelt is considered a subspecies of barley in addition to being a subspecies of wheat). Rav Yochanan ben Nuri adds that "other types" combine with each other, meaning that spelt, oats and rye all combine with each other.

The Talmud Yerushalmi (1:1), cited by the Rash Mishantz (Challah 1:1), answers that the first Mishna is discussing different grains that are thoroughly combined and mixed together into one entity, while the later Mishna is discussing different grains which are not thoroughly mixed together. The logic behind this distinction is that the obligation of *challah* begins at the point the flour is kneaded into dough, as the verse (Bamidbar 15:20) states, "As the first of your kneading you should set aside *challah* as your portion." Therefore, when flours from different species already mixed into one entity are kneaded into a single dough, they combine, regardless of their respective types, to form the requisite amount to be obligated in the mitzvah of *challah*. However, separate doughs of different types of grain that are not thoroughly combined into a single dough, but are merely attached and still appear to be two entities, are more limited in their ability to combine for the necessary volume, and only those halachically related combine.

Rashi (Menachos 70a s.v. *kusmin*), however says that the second Mishna is actually an explanation of the first Mishna. According to this explanation, only the combinations listed in the second Mishna add up for the necessary volume.

The Shulchan Aruch (Yoreh Deah 324:2) follows the approach of the Yerushalmi that all Five Grains combine for the proper amount to be obligated in *challah* when they are thoroughly mixed, while independent doughs that are attached are limited in their ability to combine. The Prisha (ibid.:4) says that this halacha is limited to flour, but not to thoroughly mixed doughs of different types. However, the Taz (ibid.:2) argues that the halacha applies to doughs, as well. The Aruch Hashulchan (ibid.:11) cites the opinion of the Taz. However, the Yeshuos Yaakov (ibid.:2) seems to rule in accordance with the Prisha. A halachic authority should be consulted for a practical ruling.

¹ See Rash Mishantz Challah 1:1 s.v. *chamisha* who cites three sources for this halacha.

² See previous *Iyun Halacha* article, *Laws of Challah Part 1*, for a discussion of the requisite volume of flour.

There are two opinions cited in the Shulchan Aruch (Yoreh Deah 324:2) regarding exactly which of the Five Grains combine for a *shiur* that is obligated in *challah*; these opinions are predicated upon the question of whether, in the second Mishna discussed earlier, Rav Yochanan ben Nuri is explaining the Tanna Kamma's opinion (whose ruling is the practical halacha) or disagreeing with it. The Rosh (Hilchos Challah 10) takes the latter approach and rules that wheat may only be combined with spelt; spelt may be combined with the other four species; barley can be combined with all species except for wheat; rye can be combined with barley and spelt but not with oats or wheat; oats may be combined with barley and spelt but not with wheat or rye³. The Rambam (Bikkurim 7:3) takes the former approach and rules that spelt, oats and rye may be combined together.

Non-Five Grains flour: The Mishna (ibid. 1:4) teaches that rice flour is exempt from the mitzvah of *challah*. Nonetheless, a later Mishna (ibid. 3:7) teaches that dough made from a combination of rice and wheat flour is obligated in *challah* if it tastes like wheat. The Rash Mishantz (ad. loc.) cites the Gemara (Zevachim 78a) that this is true even if the majority is rice flour. However, he cites the Yerushalmi (Challah 3:5) that Rabban Shimon ben Gamliel argues that the dough is obligated in *challah* only when the requisite volume of flour of the Five Grains is present.

The Rishonim wonder how dough whose majority is rice flour can be obligated in the mitzvah of *challah*, since the status of an item follows the *rov*, the majority, which is *challah*-exempt rice flour. The Ramban (Hilchos Challah; cited in Rosh Hilchos Challah 15) explains that wheat flour is *gorer* (lit, drags) rice flour to it when they are combined. One reason the Ramban provides is that it is normal for people to make dough with a combination of wheat flour and rice flour. A second reason offered by the Ramban is that Chazal ascertained that such a mixture can become *chametz*, a hallmark of the Five Grains. The Rosh (ibid.) offers a different explanation based on the halacha of *ta'am ki'ikur* (lit., taste is like the essence), a halacha that has far-ranging application in the laws of *kashrus* and elsewhere which says that the presence of the flavor of an item is sufficient to prevent its nullification in a majority (though taste is generally nullified in sixty parts of other foods). He explains that the taste of the wheat flour has the ability to transform the rice flour by infusing its taste into it.

A practical difference between these two opinions is whether this halacha applies specifically to rice flour that is mixed specifically with wheat flour, or it applies to flour of any of the Five Grains combined with any non-Five Grains flour. According to the Ramban's approach, this halacha is specific to rice flour combined with wheat flour. According to the Rosh, anything can combine, so long as it is infused with the taste of the Five Grains flour.

The Shulchan Aruch (Yoreh Deah 324:9) rules that dough made of a combination of rice and wheat flour is obligated in *challah* if it tastes like wheat, even when it is majority rice flour. The Taz (Yoreh Deah 324:9) writes that this applies

³ It would seem that rye and oats, as mere subspecies of barley, cannot combine with each other even though they combine with barley itself. Less clear is why spelt, as a subspecies of barley, is able to combine with barley subspecies. See Prisha ibid.:2 who says that spelt is more barley-like and thus has a greater ability to combine with barley subspecies.

even when there is not enough wheat flour to be obligated in *challah* (which is not in accordance with the Yerushalmi cited in the Rash). He continues that the Shulchan Aruch specifically discussed this case of a combination of rice and wheat flour following the opinion of the Ramban, who limits this halacha to rice and wheat. The Shach (Yoreh Deah 324:17) also writes that this is the implication of the Shulchan Aruch. The Shach notes, however, that the Tur applies this halacha to anything combined with any of the Five Grains as long as it tastes like the Five Grains. It emerges that the Tur follows the ruling of his father the Rosh.

Methods of combining dough or baked goods: The Mishna (Challah 2:4) states that two doughs combine for the requisite *shiur* through *neshicha* (lit., biting)⁴. The Rash Mishantz (ibid.) explains that “biting” means that the two doughs become connected to the point that upon separating one dough from the other, some of the other dough would remain attached.

Rabi Eliezer (ibid.) argues that even after baking, the breads are combined if they are placed into one *sal* (lit., basket). The Shevet Halevi (10:192) writes that a bag or box qualifies as a *sal*.

Rav Achai Gaon (Sheiltos diRav Achai 73) explains that the Tanna Kamma views the obligation of *challah* as dependent on the time of kneading the dough, since the Torah (Bamidbar 15:20) states regarding *challah*, “As the first of your kneading.” Rabi Eliezer argues that the obligation can come into effect even after the dough already became bread, since another verse regarding *challah* states (Bamidbar 15:19) “from the bread.” The Gemara (Pesachim 48b) rules in accordance with Rabi Eliezer.

The Gemara (Pesachim ibid.) wonders whether placing loaves of bread on a board combines them, but leaves the question unresolved. The Rambam (Bikkurim 6:17) rules leniently that the loaves do not combine on a board, since *challah* today is a Rabbinic obligation.

The Smak writes that spreading a cover over the loaves combines them, and this ruling is cited in the Tur (Yoreh Deah 325:1). There is a question exactly what is considered “covering” for this purpose. The Smak and Tur’s language indicates that a basic covering on top of the dough or baked goods is sufficient. However, the Shach cites the Maharil who says that if one does not have a container large enough to contain all of the dough, it may be placed in a cloth, which should then be wrapped over the top of the dough. This seems to indicate that the dough must be wrapped bottom and top, not merely covered on top. The Pri Megadim (Orach Chaim 457 Mishbitzos Zahav 1) says that wrapping bottom and top is necessary; merely covering the top, even if the bottom is placed on a flat slab, is insufficient. However, the Aruch Hashulchan (Yoreh Deah ibid.:5) disagrees with the Pri Megadim and says that covering the top is sufficient, pointing out that the Tur makes no indication that a full wrap is necessary. He adds that the Shach (cited above) is not a proof to the Pri Megadim, but he does not explain why. The Minchas Shai (13) explains that the Maharil cited in the Shach is simply discussing a practical approach in the absence of a sufficiently large container, and placing the dough in a cloth allows the dough to sit on a clean surface; there is no indication that the Maharil is rejecting the validity of just covering the top of the dough. The Bi’ur Halacha discusses both sides of the question, also noting that the Smak’s language indicates that a covering on top is sufficient. The Bi’ur Halacha concludes that the practical halacha needs further examination. It is therefore advisable that one seek guidance from a halachic authority regarding this question.

The Shulchan Aruch (ibid. 325:1) rules that dough/bread combines for the

⁴ As discussed above, this is only true if the doughs are of similar types of grain.

requisite *shiur* to require *challah* through three methods: *neshicha*⁵, placement in one container, or placing a cover on top. The Rema (ad loc.) adds that when using a container to combine, one must be careful that no entire single dough or baked item is positioned above the container with none of it in the interior of the vessel. The Shach (ad loc.:4) infers, however, that if part of the dough or baked item is within the container, that is sufficient.

There is a dispute among the *poskim* whether dough or bread in one container must be touching. The Gra (Biur HaGra Yoreh Deah 325:3) writes that they must touch. However, the Taz (Orach Chaim 457:2) rules that they needn’t touch. The Mishna Berura (457:7 with Sha’ar Hatziyun 9) rules that it is preferable that they touch.

Even when the grains are able to combine, there is an additional factor to consider. If the owner of the dough is *makpid* (particular) that the two doughs not combine, they do not combine to make the requisite *shiur* (Shulchan Aruch ibid. 326:1).

For example, if one is making a small batch of regular wheat flour dough and a small batch of whole wheat flour dough, the two doughs would not combine, since the owner is *makpid* that these two doughs to combine. Similarly, if one is making two different types of cookies, the two doughs would not combine, since the owner wishes that the two flavors remain separate. (No wanting the doughs to combine for no reason besides avoiding the *challah* obligation would not stop the doughs from combining to create the requisite *shiur*.)

If there are two batches of dough that belong to two different people, they do not combine, since we assume that the owners are *makpid* that their dough not combine with the other’s dough. If the two owners are not *makpid*, the doughs could indeed combine.

In the modern kitchen, one must be aware of the potential that different batches of baked goods or doughs may be unwittingly combined. For example, if a person made a small batch of *challos* for Shabbos and placed them in a bag, and then, some time later, made a second batch of the same type of *challos* and placed them in the same bag, the total volume combines and may well meet the threshold for the *challah* obligation. An additional complication occurs when one made a batch large enough to separate *challah* without a blessing (i.e., an uncertain *challah* obligation⁶), and then, in the above scenario of adding newly-baked *challos* (also of uncertain *challah* obligation) to the bag, combined the two batches to meet the threshold for separating *challah* with a blessing (i.e., a definite *challah* obligation). The question now arises: Must *challah* be separated a second time? Other confusing scenarios can easily arise under similar circumstances, and one should seek guidance from a halachic authority regarding how to deal with (or avoid) these issues.

Another issue discussed by contemporary *poskim* is whether multiple batches of baked goods or dough, each not large enough to create a *challah* obligation, which are placed in a fridge or freezer are considered placed in a single container (i.e., the fridge or freezer) and should thus combine (see Machaze Eliyahu 1:111-116 who says they don’t combine; see also Shemiras Shabbos Kihilchasa 42:10 with fn. 39).

This second article on the laws of *challah* has covered a number of pertinent halachic issues regarding the mitzvah of *hafrashas challah*. There are many other issues not covered herein, and a third article on the laws of *challah* is planned that will continue exploring the different halachic issues of this important mitzvah.

⁵ *Neshicha* is not relevant to baked dough, since it cannot attach in its baked state.

⁶ See previous *Iyun Halacha* article, *Laws of Challah Part 1*, for a full discussion of the different amounts.

Points to Ponder

Would a dough of majority non-Five Grains flour (not rice) that also contains enough Five Grains flour for the requisite shiur be obligated in challah?

Can dough and already-baked bread combine for the requisite shiur?

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