



TaxNewsFlash

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Final regulations: Income from Indian fishing rights-related activity may be treated as compensation under section 415

The U.S. Treasury Department and IRS today issued [final regulations](#) (T.D. 10046) providing that amounts paid to a member of an Indian Tribe as remuneration for services performed in a fishing rights-related activity may be treated as compensation for purposes of applying the limits on qualified retirement plan benefits and contributions under section 415.

The final regulations adopt proposed regulations issued in November 2013 without material modification.

Effective May 4, 2026, these final regulations apply to plan years ending on or after that date.

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