

Free Speech Union briefing

Carbon Literacy Training

Thomas Harris

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Carbon Literacy Training has led to the creation of over 67,000 Carbon Literate Citizens and 191 Carbon Literate Organisations (as certified by the Carbon Literacy Project) and the number of both is growing exponentially. The Free Speech Union is concerned that the training enforces a particular view on climate change and may be introducing a new form of compelled speech into workplaces. We believe that certification schemes like the one overseen by the Carbon Literacy Project should be regulated by UK Accreditation Service.

Overview

Carbon literacy training is spreading rapidly across UK offices and places of study, with over 67,000 citizens certified as 'carbon literate' according to the [Carbon Literacy Project](#) (CLP), the main organisation behind the initiative. (Between financial year-end September 2021 and September 2022, CLP's income grew from £183.8k to £637.7k, an increase of nearly 250%.) The training takes it for granted that we're in the midst of a 'climate emergency'^{1,2} and recommends that employees embrace various radical solutions, including net zero. Carbon literacy training is often embedded within an organisation's broader Environmental, Social and Governance (ESG) strategy.

The Free Speech Union is concerned that carbon literacy training may be embedding a new form of compelled speech in British workplaces. While it's indisputable that average global temperatures have increased since the mid-nineteenth century, people hold a range of views about the causes and severity of climate change and that in turn influences their opinion about the best way to tackle it – or, indeed, whether tackling it is possible or necessary. Different solutions to tackling climate are informed by different values and recommending one approach over another inevitably involves making a political choice. There is no-such thing as an apolitical, 'scientific' solution. Consequently, employees should not be put under pressure to endorse a particular approach to tackling climate change or threatened with disciplinary action if they fail to adjust their behaviour to follow this approach, particularly outside the workplace.

1 <https://carbonliteracy.com/toolkits/local-authorities/>

2 <https://carbonliteracy.com/toolkits/civil-service/>

In those companies seeking accreditation as a Carbon Literate Organisation (CLO) – to boost their ESG rating, for instance – up to 80% staff are expected to become ‘carbon literate’. Carbon literate accreditation requires employees to embrace a particular view about climate change and identify at least one action they can take to reduce their own carbon footprint, as well as at least one action involving other people. The FSU fears that employees may be penalised if they refuse to comply with these requirements because they do not share a particular point of view.

A Free Speech Union member contacted us concerned about the repercussions on his career after challenging the content of the training and providing alternative views and different insights on the topic. We believe he was right to be concerned. To secure CLP’s platinum, gold, and silver CLO accreditation, companies are expected to embed carbon literacy in the performance targets of staff members and evaluate their annual performance accordingly. This means that employees who don’t subscribe to a particular view on climate change could find themselves missing out on pay awards or promotion unless they self-censor or pretend to hold convictions they don’t have.

What is Carbon Literacy Training?

The [Carbon Literacy Trust](#) is a charitable incorporated organisation (or CIO) formed in Manchester in April 2014³ and is usually referred to as the Carbon Literacy Project (CLP). It defines carbon literacy as “an awareness of the carbon costs and impacts of everyday activities and the ability and motivation to reduce emissions, on an individual, community and organisational basis”.

Carbon literacy is an accredited training system. It is run by CLP and can lead to the accreditation of either an individual (who is certified ‘Carbon Literate’) or an organisation (which becomes an accredited Carbon Literate Organisation or CLO). CLOs are rated by the CLP as platinum, gold, silver or bronze. [Platinum CLOs](#) include the [Environment Agency](#), [Auto Trader](#) and [Keep Scotland Beautiful](#). BBC North and the [Government Office for Science](#) are bronze CLOs, while several NHS organisations are accredited as bronze, silver and gold organisations. You can read an Environment Agency staff member’s blog entry [here](#) about becoming accredited. It

3 <https://register-of-charities.charitycommission.gov.uk/charity-search/-/charity-details/5042887/charity-overview>

dates from January 2023 when the agency achieved gold CLO status.⁴

It's also possible for a company or organisation to be accredited as a Carbon Literacy Training Organisation (CLTO). This is offered by the CLP on an invite-only basis and identifies an organisation as being eligible to provide carbon literacy training. Keep Scotland Beautiful (CLO platinum) and Manchester Metropolitan University (CLO bronze) are CLTOs.

The CLP says that 561 accredited carbon literacy courses have been designed and assessed as meeting CLP's Carbon Literacy Standard.

The focus by the CLP on Manchester appears to be prompted by Manchester's alleged responsibility for a significant amount of carbon emissions. The 'In a Single Slide' section in one of the CLP's training documents states: "Manchester was the world's first industrial city. It therefore shares responsibility for the global dependence on the fuels that generate CO₂."⁵ The implication is that the industrial revolution, far from helping to raise billions of people out of poverty, is something that English cities need to make reparations for.

It's also possible for an organisation to become a [Carbon Literacy Project Partner](#). Platinum partners, such as [Westford Mill](#), donate £50,000+ to CLP annually, while gold partners, such as [Auto Trader](#) (which has also been granted platinum CLO accreditation), donate £25,000+. In 2019, CLP received a £170,000 grant from the Department for Business, Energy & Industrial Strategy.⁶

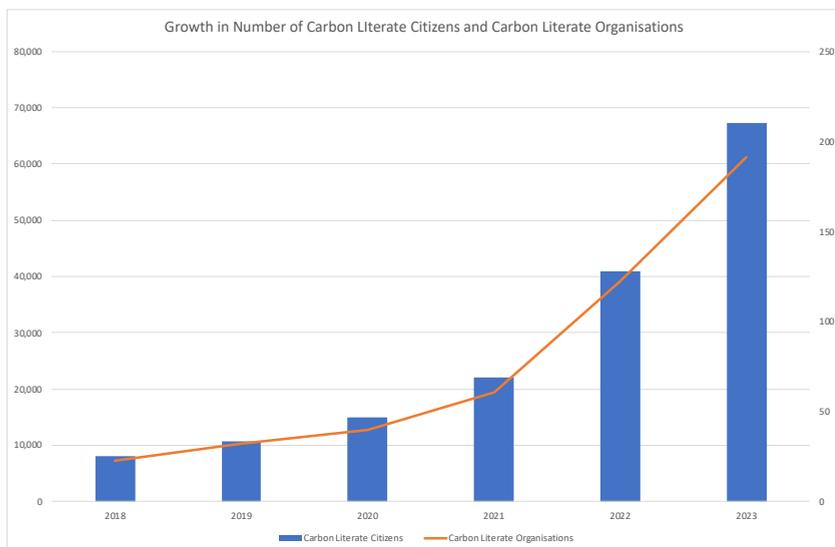
One concern the FSU has is that the CLP, which appears to certify nearly all carbon literacy training programmes and receives hundreds of thousands of pounds from public agencies, is not externally or independently regulated other than by the Charity Commission.

The chart below shows the exponential growth in both the numbers of Carbon Literate Citizens and Carbon Literate Organisations, especially since reporting year-end 2021 (CLP's reporting year ends on 30th September).

4 <https://carbonliteracy.com/trainer-consultant/cltos/>

5 <https://carbonliteracy.com/wp-content/uploads/2020/03/Introduction-to-Carbon-Literacy-Pack-v2.pdf>

6 See Annual Return for 2019: <https://register-of-charities.charitycommission.gov.uk/charity-search/-/charity-details/5042887/accounts-and-annual-returns>



Source: Accounts and Annual Returns of Charity number 1156722 and CLP website.⁷

This growth may accelerate further still since the Department for Education will be [signposting carbon literacy training](#) in a hub of third-party resources that the 'sustainability leads' for all nurseries, schools and colleges in England will have access to from December 2023.

Carbon Literate Citizens

The Individual⁸ section of CLP's website claims that over 67,000 citizens are now certified as carbon literate; it also contains the following statement, suggesting that those who've received this training are better citizens and more desirable employees:

Carbon Literacy is a desirable asset for any employer. A Carbon Literate citizen will display compassion for the environment, their health, and the health of those around them. This makes them directly more employable.⁹

On its website, CLP has published its [Introduction to Carbon Literacy](#)

⁷ <https://register-of-charities.charitycommission.gov.uk/charity-search/-/charity-details/5042887/accounts-and-annual-returns>

⁸ <https://carbonliteracy.com/individual/>

⁹ <https://carbonliteracy.com/individual/>

pack. The document explains how we “need to change the culture as well as the technology” if we are “to cut carbon emissions by the kind of reduction targets demanded by science, by 2050”.

The phrase “demanded by science” is worrying, suggesting that the CLP is trying to smuggle a particular ideology into Britain’s workplaces by pretending it aligns with ‘science’, when in fact it aligns with a particular set of political values. A recent article in the *New Yorker* referred to this rhetorical device as ‘moralistic scientism’ and defined it as the pretence that science infallibly validates left-wing moral sensibilities.¹⁰

The Free Speech Union is concerned that some of the CLP’s objectives and approaches encourage companies to politically indoctrinate their staff, both by making carbon literacy training mandatory and insisting employees comply with post-training targets. Even if the training is not compulsory, employees may feel under pressure to attend and may not feel able to object to elements of the training or the ideology underlying it without jeopardising their careers. The ‘call to action’ element of the training might also constitute interference in an employee’s private life.

The following are extracts from the CLP carbon literacy training pack:

Core Element 3: Values

- Overall, the outcome of the changes we need to see can lead to a better world, and a better way of life.
- Equity and fairness, now and in the future, underlies the change we want to see in the UK and globally.

Core Element 4: Action

Learners will:

- Create at least one significant action to reduce their individual carbon footprint.
- Create at least one significant action involving other people to reduce the collective footprint of their workplace, community, or place of education.

¹⁰ Emma Green, ‘The Case for Wearing Masks Forever’, *The New Yorker*, 28th December 2022. <https://www.newyorker.com/news/annals-of-activism/the-case-for-wearing-masks-forever>

Carbon Literate Organisations

There are currently 191 accredited CLOs¹¹ and part of the CLP's website is dedicated to how to [become a CLO](#). This contains a link to a package of documents that outline the criteria for how to become CLO bronze, silver, gold, or platinum. The package also contains a pricing guide: as of August 2022, a £1bn+ turnover company seeking immediate platinum CLO accreditation would need to pay £16,000 to the CLP. Re-accreditation is required every three years.

The two parts of the CLO application process that most concern the FSU are the need for a threshold percentage of employees to be certified as carbon literate and the integration of carbon literacy into the performance management systems of the accredited organisation.

Workforce Certification

CLO silver accreditation requires a “substantial percentage of the workforce certified as Carbon Literate”. This varies by size of organisation, with the percentage being 25% or over for companies with 11-25 workers. For CLO gold, this jumps to at least 50% of workers, and for CLO platinum the threshold is over 80%.

We worry that a company pursuing its next level of accreditation could end up coercing employees into endorsing politically contentious policies, such as net zero, that are at odds with their personal views on climate change.

Performance Management and Assessment

The notes relating to CLO silver accreditation include the following:

This is likely to include the appearance of Carbon Literacy and its consequent actions in Organisational, Team and Individual Objectives, but also of the support being offered within the organisation for individuals and teams delivering results as a consequence of the action requirements of training...

In most organisations, pay increases and/or promotions are directly related to the achievement of an individual or team goal or goals established at the beginning of each assessment year. The inclusion of carbon literacy in this process is troubling and could leave a climate contrarian failing to

11 <https://carbonliteracy.com/about-us/>

achieve a pay rise or promotion because of his or her political beliefs. At present, climate contrarianism is not a belief protected by the Equality Act 2010, but it's possible that the Employment Tribunal would decide that it is – a belief in veganism and democratic socialism are protected, as is the belief that sex is binary and immutable. If the Employment Tribunal does decide that climate contrarianism is protected, that would make mandatory carbon literacy training and the embedding of related targets into performance management systems potentially unlawful.

Carbon Literacy Toolkits

The CLP has released a series of [toolkits](#) that provide sector-specific, off-the-shelf carbon literacy training courses. These have been written for eight unique sectors: Automotive, Civil Service, Healthcare, Local Authorities, Museums, Social Housing, Sport, Universities and Colleges.

We have highlighted some of the more politically contentious statements from within these toolkits:

Civil Service

- [T]he Toolkit provides civil servants with the tools to lead by example in how they procure, run and govern operations and clearly communicate the rationale for behaviour change in a way that resonates with the public.
- There is a dedicated section which provides civil servants with the opportunity to consider how climate change can be integrated into their day-to-day decision making, role and policy and how climate action can be co-ordinated across the civil service.

Local Authorities

- Three-quarters of local authorities have now declared a climate emergency. Such a declaration should place the climate emergency at the centre of a local authority's agenda and assign responsibility to all employees to tackle climate change, not just those with roles in climate change mitigation.

Museums

- Museums have a distinct place within our communities and wider society. They act as stewards of heritage, culture, nature and more. They tell the most important stories of humans and our planet. And they engage millions of people each year, both physically and digitally,

and are widely trusted by their audience. Museums are therefore perfectly placed to engage with climate change and empower people to reduce their emissions.

United Kingdom Accreditation Service

The [United Kingdom Accreditation Service](#) (UKAS) is the national accreditation body for the United Kingdom. It is appointed by the government to assess and accredit organisations that provide services including certification, testing, inspection and calibration.

As carbon literacy accreditation schemes such as CLP proliferate, particularly in the public sector, we believe it's in the public interest for them to seek out UKAS accreditation. This would ensure that any concerns about the impact of these schemes on employees' speech rights could be raised with an independent external body.

